REPORT of the SASKATCHEWAN COMMERCIAL BINGO INQUIRY

SUMMARY and RECOMMENDATIONS

Saskatchewan Commercial Bingo Inquiry
1871 Smith Street
Regina, Saskatchewan
S4P 3V7

February 6, 1986

Honourable Joan H. Duncan
Minister
Consumer and Commercial Affairs
Room 348, Legislative Building
REGINA, Saskatchewan

Dear Mrs. Duncan:

I am pleased to submit this report to you on behalf of myself and my fellow commissioners, Margaret Cuddington and Ann Matthews.

This report was commissioned by Order in Council #596/85 dated May 29, 1985 under The Public Inquiries Act to study the operations and effects of commercial bingo halls on charities and communities in Saskatchewan.

The importance of this issue has led to extensive deliberations and review of all material that the Inquiry has received. We would like to thank all those who presented written and verbal submissions to the Bingo Inquiry.

We hope that this report and its recommendations will assist you and your government in developing improved policy relating to the game of bingo for all residents of Saskatchewan.

Sincerely,

Norman McConnachie
Chairman
Saskatchewan Commercial Bingo Inquiry

Executive Summary

Section 189 of the Criminal Code prohibits gaming activity in Canada; however, section 190 grants the provinces the right to legalize gaming providing it is conducted and managed by charitable organizations and the funds raised are used for a charitable purpose.

The game of bingo has been played in Saskatchewan for many years. It has been a successful means of raising funds for charities and has served as a form of entertainment for many. In 1982, the first commercial bingo hall opened in Saskatchewan; as of December 1985, the number of commercial halls has increased to twenty-three. In 1982/83, the spending on provincially licensed bingo was $4.6 million compared with $30.4 million in 1984/85. The amount going to charity rose from $1.2 to $4 million over the same period.

This growth in spending is significant, for it clearly demonstrates the potential funds available to both charitable organizations and commercial hallowners. During the past several years, a number of problems have emerged, including:

- the impact that large commercial bingo halls are having on the more traditional smaller community bingos;
- the distribution of revenues among hall operators, prizes and sponsoring charities; and
- concerns as to whether funds raised from bingo are in fact being used for legitimate charitable causes.

Because of these and other problems, the Saskatchewan Commercial Bingo Inquiry was established. After studying over 500 submissions and listening to more than 200 verbal presentations the members of the Inquiry have come to the following conclusions:

- The proportion of gross bingo revenues going to charity should be increased.
- Funds should go only to purposes which are demonstrably charitable.

- The efficiency and the accountability of the transfer of funds from bingo players to charity should be improved.
- Controls should be implemented so that small community and traditional bingos will, once again, become viable.
- The bingo hall should become less of a gambling parlour and more of a place of entertainment; there should also be a lessening of the incentives which entice players to spend such large sums during a bingo event.
- The government and the licensing authority should review and respond to the ongoing concerns of local governments and interest groups on the impact of bingo.
- More controls should be exerted on bingo to ensure regulations (provisions) are observed and so that crime or other undesirable spin-offs do not result.

By clarifying and making more specific the terms and conditions that govern bingo, establishing a body with sole responsibility for gaming, requiring that sponsors rather than hall operators control all facets of bingo games and by reducing the dollar amount of prizes offered, a healthier and better controlled environment for bingo will be created.

The Inquiry has developed a total of thirty-six recommendations including the following:

- prize limits be established at $3,000 per session;
- accumulating prizes be eliminated;
- the sale of break-open (nevada) tickets be banned in all bingo halls;
- a new, more restrictive definition of charitable object or purpose be adopted;
- a gaming authority be established to assume responsibility for gaming including bingo, raffles, nevada tickets and casinos;

- to ensure that the licence holder is in full control of the bingo event, sponsor associations be made mandatory in all halls that are used primarily for bingo (those holding four or more events per week); and
- there will be no payments to hall owners on the a basis of a percentage of gross spending.

The subject matter of the Inquiry is complex and the interested reader should refer to the full report or to the more complete summary and recommendations that precede Chapter One.

SUMMARY AND RECOMMENDATIONS

The Saskatchewan Commercial Bingo Inquiry, announced by the Honourable Joan H. Duncan on May 15, 1985 and authorized under The Public Inquiries Act of Saskatchewan, hereby submits its report. The Commission of Inquiry has thoroughly researched the matters raised in its terms of reference, has reviewed 513 written submissions from the public, and has held hearings in 11 Saskatchewan communities where 214 groups or individuals presented evidence. The Inquiry developed its recommendations independently of the government. Issues and recommendations are summarized below.

Social Impact Issues

Taking into account the rapid growth of large-scale bingo halls since 1982 and the resulting social impacts, the Commission concludes that, on balance, the social costs of bingo in 1985 outweighed the social benefits. The time, therefore, for policy and administrative action is now, in order to ensure that benefits of gaming activity to Saskatchewan exceed the costs. The Commission examined many different views before developing social objectives. From the point of view of charitable organizations, bingo has opened new and lucrative opportunities for raising funds. The share of bingo revenues going to charity in 1981/82 was about $600,000, compared with just less than $4,000,000 in 1984/85. The proportion of gross spending on bingo going to charity has, however, dropped from 27% to 13% during these same years. Furthermore, numerous submissions and presentations stated that some organizations spend their bingo proceeds in frivolous, self-fulfilling, and inefficient ways. For example, the social benefit of the substantial revenues going to adult sports clubs from their bingos was questioned by the Commission. In regard to business impact, the Commission heard that bingo halls provide employment and other economic spin-offs through the purchase of supplies and equipment. Other Inquiry participants, however, questioned the net value of the business impact and they cited negative factors such as congestion in parking malls, the outflow of cash from the community, and bingo players no longer having cash to make purchases at local business establishments.

The horse racing industry claimed it had been harmed by the expansion of bingo that has not been as heavily regulated as other gaming areas. Church and small community groups that raised money through bingos on their own premises have been struck severely as a result of the growth of big bingo. Many of these small operations have ceased to exist and the former beneficiaries of these groups have failed in their search for alternative sources of funds. For some bingo players, bingo is a social night out and a chance to be with friends. In many cases, though, bingo halls have become gambling parlours where lower-income players are lured into making large expenditures on bingo and nevada tickets three or more times a week. The Commission heard of cases of alleged child neglect due to the loss of income and the stress that comes with the gambling habit. The potential for moral decay and the entrance of organized crime due to the rapid, uncontrolled growth of gambling were also cited by Inquiry participants as reasons for a change in public policy.

After considering the overall social impact of bingo, the Commission developed the following objectives to assist in making recommendations:

- The proportion of gross bingo revenues going to charity should be increased.
- Funds should go to purposes which are demonstrably charitable.
- The efficiency and the accountability of the transfer of funds from bingo players to charity should be improved.
- Controls should be implemented so that small community and traditional bingos will, once again, become viable.
- The bingo hall should become less of a gambling parlour and more of a place of entertainment; there should also be a lessening of the incentives which entice players to spend such large sums during a bingo event.

- The government and the licensing authority should review and respond to the ongoing concerns of local governments and interest groups on the impact of bingo.
- More controls should be exerted on bingo to ensure regulations (provisions) are observed and so that crime or other undesirable spin-offs do not result.

Bingo Prizes and the Sale of Paper

As the number of bingo halls has increased, the competition to lure bingo players has been keen. Prize levels have been driven upwards. The average prize value per bingo session was $1,490 in 1982/83 compared with $2,795 in 1984/85. In addition, jackpots accumulating to $20,000 or more have become common. The setting of the prizes has been controlled by the hall operators rather than by the sponsor.

Two serious problems have resulted. First, the larger halls with their ability to offer larger prizes have drawn players away from other halls. Many small bingos have folded; many medium-sized operations (and their sponsors) are in jeopardy. Secondly, as the percentage being paid out in prizes has increased the amount remaining for the sponsor has decreased proportionately. Bingos are licensed in order to raise funds for charity. It is generally accepted in Saskatchewan that at least 20% of bingo revenues should remain for the sponsor after payment of prizes and expenses. The amount currently being earned by the sponsor averages less than 9% and many bingos provide no return to the sponsor.

The Commission also considered other problems associated with prizes, such as the use of jackpots for misleading advertising, the lack of accountability in the administration of trust accounts for accumulating jackpots, and the drainage of revenues within the community away from worthwhile charities when "super bingos" with prizes of $25,000 to $100,000 are held.

Sponsors and hall operators were almost unanimous in their call for prize limits, even though they have been unable to implement this limit without government involvement.

In regard to prizes the Commission recommends that:

1. Prize limits be established at $3,000 per session. This amount includes door prizes, promotional prizes and all other non-cash prizes.

2. Maximum prize for an individual game within a session not to exceed $1,000.

3. Accumulating prizes be eliminated.

4. Bingos with prize payouts over $3,000 be restricted and that if one is requested it be authorized by Order in Council only if it is of clear benefit to the community.

The Commission also examined the marketing tool of discounting bingo paper prices. The result, as far as the sponsor is concerned, is the same as when there is a high prize board, and the Commission recommends that:

5. The discounting of bingo paper be disallowed.

Definition of Charitable Object or Purpose

The Commission has found the current definition of a charitable object that is used by the Department of Consumer and Commercial Affairs to be excessively broad and, furthermore, has found that the Department rarely, if ever, rejects any organization that claims to have charitable purposes. The Department has not investigated the degree of true charitability and has not monitored the ultimate expenditures of bingo revenues by charities. Numerous individuals and groups told the Inquiry that policies should be introduced, including a revision to the definition of a charitable object, to ensure that bingo proceeds go to causes that are truly charitable.

The Commission recommends that:

6. A bingo licensee must:

   (a) be registered under The Non-Profit Corporations Act as a charitable organization;

   (b) have been in existence as an organization one year prior to applying for a licence to hold a bingo; and

(c) have a charitable object or purpose as listed below for:

- (i) relief of poverty;
- (ii) programs for the disadvantaged;
- (iii) education that is beneficial to children, the disadvantaged or the community at large;
- (iv) public facilities for sports, recreation and culture;
- (v) the advancement of religion;
- (vi) a purpose beneficial to the community and available to a significant portion of the community (rather than the limited self-use of the members); and
- (vii) notwithstanding (vi), some limited benefits for minor sports (associations as opposed to individual teams).

7. The following specifically be excluded from gaining bingo licences:

   - (a) political parties;
   - (b) unions;
   - (c) adult sport and recreation organizations.

8. Proceeds from bingos be used within the province of Saskatchewan unless specifically authorized (i.e., the licensing authority may grant permission to allocate funds to recognized charities outside the province).

9. All organizations submit to the licensing authority with their application for a bingo licence a detailed proposal and budget for the expenditure of bingo funds.

10. Funds raised from bingos not be returned to the licencee's general revenue but must be earmarked for specific projects.

Licensing, Investigation, Administration

As directed by the terms of reference, the Commission received views on the functions and the effectiveness of the bingo licensing unit in the Department of Consumer and Commercial Affairs. Submissions and participants at public hearings tended to criticize the

Department on its lack of clarity and consistency in communicating and enforcing gaming rules and its lack of co-ordination with the RCMP, city police and other groups. Of particular concern was the Department's apparent lack of effort to enforce existing provisions such as the 20% expense limit and the control of the bingo event by the sponsor. The option to withold bingo licences from a particular sponsor or from all sponsors at an offending hall appears never to have been seriously considered. The Commission noted, however, that there were constraints placed upon the licensing unit, such as the complications of responding to dramatic changes in licensed gaming activity, the administrative structure which does not result in priority being given to gaming issues, and the lack of sufficient staff. A further constraint is that there was no federal legislation until 1986 that would allow provinces to bring in regulations with appropriate penalties.

The Commission recommends that:

11. A gaming authority be established responsible to a Minister of the Government of Saskatchewan to take over all responsibility for gaming from the Licensing and Investigation Branch of the Department of Consumer and Commercial Affairs.

12. Powers be granted to the gaming authority to administer all legislation relating to bingos, break-open tickets, casinos and raffles.

13. The authority be governed by a board of appointed representatives and be composed of two branches, the first responsible for licensing and the second responsible for investigation.

14. Funding for the gaming authority come from the 2% levy on prizes.

15. The gaming authority monitor the purchase of bingo paper from approved suppliers.

16. The licensing branch of the proposed gaming authority:

(a) receive and review all applications for gaming licences to determine:

(i) that the applicant qualifies as a charitable organization;

(ii) that the proposals for use of the proceeds are appropriate;
(iii) that the plan for income and expenses will result in an appropriate distribution of revenue among prizes, expenses and proceeds to charity;

(b) provide for an appeal process for those groups refused licenses;

(c) act as a policy and planning body for the gaming authority that will recommend new policies in the gaming field to the government when necessary;

(d) be the educational arm of the authority, providing information about gaming to players, sponsors, hall owners and the general public.

17. The investigation and auditing branch of the proposed gaming authority:

(a) investigate any irregularities that may arise in the field of gaming; and

(b) have the authority to audit any sponsor or any individual or group that has business dealings with sponsors or hall owners and audit and investigate any of the above-mentioned activities when circumstances warrant it.

Revenue distribution at bingo halls should be closely monitored in future; this is an issue that the proposed gaming authority should thoroughly address. After examining a number of options, the Commission concluded that any fixed revenue distribution targets would become an inflexible management tool and could give unfair competitive advantages to a few operators.

Therefore, the Commission recommends that:

18. The limit of 20% for expenses be deleted from the licensing provisions, and

19. The gaming authority review all applications for licences to determine that the plan for income and expenses will result in an appropriate distribution of revenue among prizes, expenses and proceeds to charity.

Control of the Bingo Operation

Several of the existing provisions for lottery licensing make clear that it must be the sponsor and not the hall operator who controls the bingo. Yet, as numerous submissions and presentations at public hearings indicated, the operators of large halls are in the position to control bingo events from beginning to end and to otherwise dominate organizations in all dealings involving bingo. More specifically, the Commission examined instances where the operator has been allowed to control the event through the selection of sponsors, the scheduling of events, the absence of negotiation in the setting of a contract, the setting of prize boards, the advertising and promoting, the control of bingo paper and the control of trust accounts. In other instances, operators have supervised the flow of cash in the bingo hall.

The Commission re-affirms the importance of control by the licensed sponsor and proposes that the achievement of this objective should be an important function of the proposed gaming authority.

Some have argued that businesses such as bingo halls should not be hampered by government regulations. Bingo, however, is not "business." It is gambling and is only permitted to be licensed if "conducted and managed" by a charitable organization and if the proceeds are used for charitable purposes. Allowing hall owners to contol the bingos and to share in the profits is not consistent with the provisions of the Criminal Code of Canada.

To assist sponsoring organizations to assert control and effectively manage events at bingo halls, the Commission examined the concept of sponsor associations for every major bingo hall. While initial attempts in

Saskatchewan to form such associations left room for improvement, the Commission feels confident that Saskatchewan could follow the lead of other provinces which have required or have encouraged the formation of sponsor associations.

The Commission recommends that:

20. Bingo associations be mandatory in all halls used primarily for bingo (four or more events per week).

21. All sponsors must be a member of a bingo association where such associations are mandatory. Members will elect a board of directors and an executive committee and may hire (if necessary) a bingo manager.

22. The responsibilities of a bingo association will include:

    - handling all dealings with the hall owner (including rent negotiations);
    - scheduling of bingo events;
    - purchasing of paper;
    - renting, leasing or purchasing of bingo equipment;
    - advertising;
    - setting the bingo program (prizes);
    - determining eligibility for membership (see below);
    - running the concession when it is not run by the hall owner.

23. The bingo manager cannot be a member of the board of directors. Remuneration will be on a straight salary basis rather than a share of proceeds and the association may wish to consider bonding the manager.

24. The manager's duties will include the day-to-day running of the bingo hall under direction of the bingo association, including the hiring of callers (the association may also wish to consider bonding the callers).

25. Associations are encouraged to negotiate a flat rate monthly rent, with a provision that an adjustment may be made if additional bingos are

scheduled (to cover increased variable costs). There will be no payments to hall owners on the basis of a percentage of gross spending.

26. Associations will be required, prior to operating, to present their budgets for income and expenses to the proposed licensing authority for approval. The authority will review these plans in light of market conditions.

27. The association will submit a plan to the licensing authority, prior to operating, regarding the number of organizations that will form the membership, the principles for entry and exit of association members, and the participation (voting) of members within the association.

28. The above plan shall be based upon equity among members, efficiency of raising funds for specific charitable purposes, and the principle of allowing fair access to charities within the community to bingo as a means of raising funds.

29. The licensing authority shall receive reports on all exit and entry of member organizations of the bingo association and other information pertaining to the monitoring and policing of association membership.

30. Notwithstanding the existence of the association, individual organizations will make application for licences (there will be no umbrella licensing).

The Role of Local Government

The Commission received representations on such matters as business licence disputes, parking problems, Sunday bingo, hours of operation, and licensing of small bingos.

It is recommended that:

31. All bingos, irrespective of frequency and prize limits, be licensed and regulated by a provincial licensing authority.

32. No bingo licences be issued for Sunday with the exception of halls where bingos are held infrequently (no more than two bingos per week).

33. Hours of bingo be limited to 12 noon to 12 midnight (bingo sessions must begin and end during this period).

34. The licensing authority shall honour the wishes of local governments which pass bylaws to further limit the hours or days of operation.

Nevada Tickets

Since first licensed in late 1982, spending on nevada tickets has increased rapidly in bingo halls and at other points of sale. The Commission noted that many organizations are in favor of the retention of nevada tickets at bingo halls. Nevadas have become the main (and often the only) way that charities have to raise revenues. This acceptance of nevadas by sponsors appears, however, to be more related to sponsors' lack of a reasonable return from bingos and less to their specific approval of nevadas as a desirable way to raise funds. The existence of nevadas complicates the sponsor's attempt to negotiate a fair return from bingo since the sponsor is not expected to complain about the bingo proceeds if nevadas are profitable. The hall operator currently feels little obligation to ensure the sponsor a reasonable return on bingo. Further problems were the lack of accountability for funds raised from nevadas, questionable disposition of portions of unused boxes, fraudulent use of nevadas by players, and the negative effects upon bingo players due to nevada sale practices and impulse buying.

After considering views of Inquiry participants and the policies of other provinces, the Commission recommends that:

35. The sale of break-open (nevada) tickets be banned in all bingo halls.

36. The proposed gaming authority monitor the bingos closely to see that sponsors are getting sufficient revenues and, if this is not the case, the gaming authority may consider raising the cap placed on the prize board to allow reasonable revenues for the charitable organization.

The Future

Having met, to a greater or lesser degree, all the terms of reference for the Inquiry, the Commission has spent some time thinking about the future of the game of bingo if the recommendations of this report are adopted. The following is what the Commission would like to see.

The largest crowd at a bingo hall will be about 300. Halls that hold less than 300 will also operate successfully and many of the organizations that have struggled unsuccessfully to keep their games going will be able to bring back their bingo nights and again raise money.

Bingo will never go back to what it was ten years ago. It will remain somewhat of a business, but the commercial gaming house environment will fade away and the bingo night will, above all things, be a social event. Players will still be thrilled with the prospect of winning a $1,000 jackpot even though the dream of winning $20,000 or a car through the numbers on a bingo card will have evaporated. Since break-open tickets will not be peddled like peanuts, the bingo player will not spend as much for the evening out.

The commercial operator/owner will become merely a hall renter and will no longer be the dominating figure at a bingo hall. There will be little difference, if any, between commercial and non-commercial halls.

Bingo, along with other gaming activities, will become a more controlled and accountable game. The gaming authority will ensure that licensing provisions/regulations are observed, right from the initial application for a licence down to the accountability for expenditure of money on charitable purposes. The authority will function very adequately on the licensing fees it collects which, for bingo, will continue to be 2% of prizes. The principle of devoting these funds to the control of gaming will be accepted by the public who remember how the game once was nearly out of control.

Bingo associations will successfully manage the bingo hall operations and will help ensure that their members are truly in need of funds for charitable purposes. The associations will train volunteers in running bingos.

With bingo operating on a smaller scale and being more controlled, many of the former concerns of local governments and many of the social problems that were associated with bingo, will be considerably lessened.

If you need more copies of this report (Summary and Recommendations) or a copy of the full report (235 pages) at a cost of $20.00 (prepaid), please clip the bottom of this page and send it to:

Saskatchewan Consumer and Commercial Affairs
1871 Smith Street
Regina, Saskatchewan
S4P 3V7

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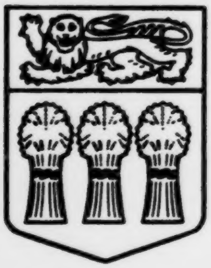

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Chairman
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Chairman: Norman McConnachie
Member: Margaret Cuddington
Member: Ann Matthews

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TABLE OF CONTENTS

Summary and Recommendations

Social Impact Issues .... i-iv
Bingo Prizes and the Sale of Paper .... v-vii
Definition of Charitable Object or Purpose... vii-viii
Licensing, Investigation, Administration .... ix-xii
Control of the Bingo Operation .... xii-xv
The Role of Local Government .... xv-xvi
Nevada Tickets .... xvi-xvii
The Future .... xviii-xx

Chapter 1 Introduction

An Historical Note........................... 2-8
The Public Inquiry........................... 8-16

Chapter 2 Social Concerns

Introduction................................. 17-18
The Revenues Generated by Bingo 18-20
The Disposition of Charitable Revenues...... 20-22
Business Impact 23
Impact on Horse Racing....................... 24-25
Impact on Traditional Bingos 25-29
Benefits and Costs to Individuals 29-37
Crime as a Social Cost 37
Objectives 37-38

Chapter 3 Bingo Prizes and the Sale of Paper

Bingo Prizes 40-47
Recommendations 47
Further Discussion on Bingo Prizes 47-52
Bingos with Prize Payouts over $3,000 52-53
Discounting of Paper Prices 53-55

Chapter 4 Definition of Charitable Object

Legal Definition 56
General Problems with the Definition 57-61
Adult Sports Groups 61-67
The Need to Define 67-68
Recommendations 69-70

Chapter 5 Licensing, Investigation and Administration

The Effectiveness of the Bingo Licensing and Investigation Unit 71-77
Reasons for Administrative Problems 77-80
Recommendations 80-81
Discussion of Recommendations 81-82
Further Recommendations on Responsibilities of the Gaming Authority 83
Discussion of the Above Recommendations 84-85
Revenue Distribution 85-88
Recommendations 88

Chapter 6 Control of Bingo Operations

Legal Aspects 89-91
Problems with Control of Prizes by the Hall Operator 91-95
Gaining Access to Bingo Halls 96-97
Event Allocation 97-98
Negotiation of Rent and Other Expenses 98-100
Control of Advertising 100
Control of Prizes 100-101
Control of Paper 101-102
Supervision During the Bingo Event 102-107
Conclusion on the Control of Halls.......... 107
Sponsor Associations 107-113

Chapter 7 The Role of Local Government

The Right to Restrict Bingo Halls 114-116
Location of Halls as it Relates to Parking . 116-117
Sunday Bingo 118
Hours of Operations 118
Licensing of Small Bingos 119
Other Concerns of Local Government 119-120
Discussion 120
Recommendations 120-121

Chapter 8 Nevada Tickets

Background 122-123
Arguments in Favour of Nevada Sales in Bingo Halls 123-125
Nevada and Bingo Revenues--Problems 125-127

Nevadas and the Bingo Player................ 127-129
The Problem of Accountability............... 129-130
Conclusions and Recommendations 130-131
Discussion of Recommendations............... 131-133

Chapter 9 The Mandate and the Future

The Opening Paragraph....................... 135-136
Terms of Reference (a) to (i)............... 136-146
The Future.................................. 146-149

Appendices

- Appendix A: Order in Council and Terms of Reference...................... 151-154
- Appendix B: Lottery Licensing Provision (O.C. 1921/82) November 24, 1982............ 155-156
- Lottery Licensing Provisions (O.C. 733/84) 28 June 1984.................. 157
- Appendix C: Letter to the Honourable Joan Duncan, Minister for Consumer and Commercial Affairs, November 22, 1985........ 158-161
- Appendix D: Lottery Licensing Activity, 1981/82-1984/85.............................. 162
- Appendix E: Chart of Revenues from Commercial and Non-Commerical Bingo Halls (first eight months of 1985)........... 163-164
- Appendix F: Brochure--"Taking Part in... The Saskatchewan Commercial Bingo Inquiry"............................... 165-167
- Appendix G: Letters to sponsors and hall operators and Questionnaires............. 168-201
- Appendix H: Letter to all sponsors, October 9, 1985.............................. 202
- Appendix I: List of all Submissions from Sponsors.................................. 203-224
- Appendix J: List of all Submissions from Hall Operators............................ 225-226
- Appendix K: List of all individuals who appeared before the Inquiry.............. 227-235

SUMMARY AND RECOMMENDATIONS

The Saskatchewan Commercial Bingo Inquiry, announced by the Honourable Joan H. Duncan on May 15, 1985 and authorized under The Public Inquiries Act of Saskatchewan, hereby submits its report. The Commission of Inquiry has thoroughly researched the matters raised in its terms of reference, has reviewed 513 written submissions from the public, and has held hearings in 11 Saskatchewan communities where 214 groups or individuals presented evidence. The Inquiry developed its recommendations independently of the government. Issues and recommendations are summarized below.

Social Impact Issues

Taking into account the rapid growth of large-scale bingo halls since 1982 and the resulting social impacts, the Commission concludes that, on balance, the social costs of bingo in 1985 outweighed the social benefits. The time, therefore, for policy and administrative action is now, in order to ensure that benefits of gaming activity to Saskatchewan exceed the costs. The Commission examined many different views before developing social objectives. From the point of view of charitable organizations, bingo has opened new and lucrative opportunities for raising funds. The share of bingo revenues going to charity in 1981/82 was about $600,000, compared with just less than $4,000,000 in 1984/85. The proportion of gross spending on bingo going to charity has, however, dropped from 27% to 13% during these same years. Furthermore, numerous submissions and presentations stated that some organizations spend their bingo proceeds in frivolous, self-fulfilling, and inefficient ways. For example, the social benefit of the substantial revenues going to adult sports clubs from their bingos was questioned by the Commission. In regard to business impact, the Commission heard that bingo halls provide employment and other economic spin-offs through the purchase of supplies and equipment. Other Inquiry participants, however, questioned the net value of the business impact and they cited negative factors such as congestion in parking malls, the outflow of cash from the community, and bingo players no longer having cash to make purchases at local business establishments. The horse racing industry claimed it had been harmed by the expansion of bingo that has not been as heavily regulated as other gaming areas. Church and small community groups that raised money through bingos on their own premises have been struck severely as a result of the growth of big bingo. Many of these small operations have ceased to exist and the former beneficiaries of these groups have failed in their search for alternative sources of funds. For some bingo players, bingo is a social night out and a chance to be with friends. In many cases, though, bingo halls have become gambling parlours where lower-income players are lured into making large expenditures on bingo and nevada tickets three or more times a week. The Commission heard of cases of alleged child neglect due to the loss of income and the stress that comes with the gambling habit. The potential for moral decay and the entrance of organized crime due to the rapid, uncontrolled growth of gambling were also cited by Inquiry participants as reasons for a change in public policy.

After considering the overall social impact of bingo, the Commission developed the following objectives to assist in making recommendations:

- The proportion of gross bingo revenues going to charity should be increased.
- Funds should go to purposes which are demonstrably charitable.
- The efficiency and the accountability of the transfer of funds from bingo players to charity should be improved.
- Controls should be implemented so that small community and traditional bingos will, once again, become viable.
- The bingo hall should become less of a gambling parlour and more of a place of entertainment; there should also be a lessening of the incentives which entice players to spend such large sums during a bingo event.
- The government and the licensing authority should review and respond to the ongoing concerns of local governments and interest groups on the impact of bingo.
- More controls should be exerted on bingo to ensure regulations (provisions) are observed and so that crime or other undesirable spin-offs do not result.

Bingo Prizes and the Sale of Paper

As the number of bingo halls has increased, the competition to lure bingo players has been keen. Prize levels have been driven upwards. The average prize value per bingo session was $1,490 in 1982/83 compared with $2,795 in 1984/85. In addition, jackpots accumulating to $20,000 or more have become common. The setting of the prizes has been controlled by the hall operators rather than by the sponsor.

Two serious problems have resulted. First, the larger halls with their ability to offer larger prizes have drawn players away from other halls. Many small bingos have folded; many medium-sized operations (and their sponsors) are in jeopardy. Secondly, as the percentage being paid out in prizes has increased the amount remaining for the sponsor has decreased proportionately. Bingos are licensed in order to raise funds for charity. It is generally accepted in Saskatchewan that at least 20% of bingo revenues should remain for the sponsor after payment of prizes and expenses. The amount currently being earned by the sponsor averages less than 9% and many bingos provide no return to the sponsor.

The Commission also considered other problems associated with prizes, such as the use of jackpots for misleading advertising, the lack of accountability in the administration of trust accounts for accumulating jackpots, and the drainage of revenues within the community away from worthwhile charities when "super bingos" with prizes of $25,000 to $100,000 are held.

Sponsors and hall operators were almost unanimous in their call for prize limits, even though they have been unable to implement this limit without government involvement.

In regard to prizes the Commission recommends that:

1. Prize limits be established at $3,000 per session. This amount includes door prizes, promotional prizes and all other non-cash prizes.
2. Maximum prize for an individual game within a session not to exceed $1,000.
3. Accumulating prizes be eliminated.
4. Bingos with prize payouts over $3,000 be restricted and that if one is requested it be authorized by Order in Council only if it is of clear benefit to the community.

The Commission also examined the marketing tool of discounting bingo paper prices. The result, as far as the sponsor is concerned, is the same as when there is a high prize board, and the Commission recommends that:

5. The discounting of bingo paper be disallowed.

Definition of Charitable Object or Purpose

The Commission has found the current definition of a charitable object that is used by the Department of Consumer and Commercial Affairs to be excessively broad and, furthermore, has found that the Department rarely, if ever, rejects any organization that claims to have charitable purposes. The Department has not investigated the degree of true charitability and has not monitored the ultimate expenditures of bingo revenues by charities. Numerous individuals and groups told the Inquiry that policies should be introduced, including a revision to the definition of a charitable object, to ensure that bingo proceeds go to causes that are truly charitable.

The Commission recommends that:

6. A bingo licencee must:

    (a) be registered under The Non-Profit Corporations Act as a charitable organization;

(b) have been in existence as an organization one year prior to applying for a licence to hold a bingo; and

(c) have a charitable object or purpose as listed below for:

   (i) relief of poverty;
   (ii) programs for the disadvantaged;
   (iii) education that is beneficial to children, the disadvantaged or the community at large;
   (iv) public facilities for sports, recreation and culture;
   (v) the advancement of religion;
   (vi) a purpose beneficial to the community and available to a significant portion of the community (rather than the limited self-use of the members); and
   (vii) notwithstanding (vi), some limited benefits for minor sports (associations as opposed to individual teams).

7. The following specifically be excluded from gaining bingo licences:

   (a) political parties;
   (b) unions;
   (c) adult sport and recreation organizations.

8. Proceeds from bingos be used within the province of Saskatchewan unless specifically authorized (i.e., the licensing authority may grant permission to allocate funds to recognized charities outside the province).

9. All organizations submit to the licensing authority with their application for a bingo licence a detailed proposal and budget for the expenditure of bingo funds.

10. Funds raised from bingos not be returned to the licencee's general revenue but must be earmarked for specific projects.

Licensing, Investigation, Administration

As directed by the terms of reference, the Commission received views on the functions and the effectiveness of the bingo licensing unit in the Department of Consumer and Commercial Affairs. Submissions and participants at public hearings tended to criticize the Department on its lack of clarity and consistency in communicating and enforcing gaming rules and its lack of co-ordination with the RCMP, city police and other groups. Of particular concern was the Department's apparent lack of effort to enforce existing provisions such as the 20% expense limit and the control of the bingo event by the sponsor. The option to withold bingo licences from a particular sponsor or from all sponsors at an offending hall appears never to have been seriously considered. The Commission noted, however, that there were constraints placed upon the licensing unit, such as the complications of responding to dramatic changes in licensed gaming activity, the administrative structure which does not result in priority being given to gaming issues, and the lack of sufficient staff. A further constraint is that there was no federal legislation until 1986 that would allow provinces to bring in regulations with appropriate penalties.

The Commission recommends that:

11. A gaming authority be established responsible to a Minister of the Government of Saskatchewan to take over all responsibility for gaming from the Licensing and Investigation Branch of the Department of Consumer and Commercial Affairs.

12. Powers be granted to the gaming authority to administer all legislation relating to bingos, break-open tickets, casinos and raffles.

13. The authority be governed by a board of appointed representatives and be composed of two branches, the first responsible for licensing and the second responsible for investigation.

14. Funding for the gaming authority come from the 2% levy on prizes.

15. The gaming authority monitor the purchase of bingo paper from approved suppliers.

16. The licensing branch of the proposed gaming authority:

    (a) receive and review all applications for gaming licences to determine:

        (i) that the applicant qualifies as a charitable organization;

        (ii) that the proposals for use of the proceeds are appropriate;
        (iii) that the plan for income and expenses will result in an appropriate distribution of revenue among prizes, expenses and proceeds to charity;

(b) provide for an appeal process for those groups refused licenses;

(c) act as a policy and planning body for the gaming authority that will recommend new policies in the gaming field to the government when necessary;

(d) be the educational arm of the authority, providing information about gaming to players, sponsors, hall owners and the general public.

17. The investigation and auditing branch of the proposed gaming authority:

    (a) investigate any irregularities that may arise in the field of gaming; and

    (b) have the authority to audit any sponsor or any individual or group that has business dealings with sponsors or hall owners and audit and investigate any of the above-mentioned activities when circumstances warrant it.

Revenue distribution at bingo halls should be closely monitored in future; this is an issue that the proposed gaming authority should thoroughly address. After examining a number of options, the Commission concluded that any fixed revenue distribution targets would become an inflexible management tool and could give unfair competitive advantages to a few operators.

Therefore, the Commission recommends that:

18. The limit of 20% for expenses be deleted from the licensing provisions, and

19. The gaming authority review all applications for licences to determine that the plan for income and

expenses will result in an appropriate distribution of revenue among prizes, expenses and proceeds to charity.

Control of the Bingo Operation

Several of the existing provisions for lottery licensing make clear that it must be the sponsor and not the hall operator who controls the bingo. Yet, as numerous submissions and presentations at public hearings indicated, the operators of large halls are in the position to control bingo events from beginning to end and to otherwise dominate organizations in all dealings involving bingo. More specifically, the Commission examined instances where the operator has been allowed to control the event through the selection of sponsors, the scheduling of events, the absence of negotiation in the setting of a contract, the setting of prize boards, the advertising and promoting, the control of bingo paper and the control of trust accounts. In other instances, operators have supervised the flow of cash in the bingo hall.

The Commission re-affirms the importance of control by the licensed sponsor and proposes that the achievement of this objective should be an important function of the proposed gaming authority.

Some have argued that businesses such as bingo halls should not be hampered by government regulations. Bingo, however, is not "business." It is gambling and is only permitted to be licensed if "conducted and managed" by a charitable organization and if the proceeds are used for charitable purposes. Allowing hall owners to contol the bingos and to share in the profits is not consistent with the provisions of the Criminal Code of Canada.

To assist sponsoring organizations to assert control and effectively manage events at bingo halls, the Commission examined the concept of sponsor associations for every major bingo hall. While initial attempts in Saskatchewan to form such associations left room for improvement, the Commission feels confident that Saskatchewan could follow the lead of other provinces which have required or have encouraged the formation of sponsor associations.

The Commission recommends that:

20. Bingo associations be mandatory in all halls used primarily for bingo (four or more events per week).

21. All sponsors must be a member of a bingo association where such associations are mandatory. Members will elect a board of directors and an executive committee and may hire (if necessary) a bingo manager.

22. The responsibilities of a bingo association will include:

    - handling all dealings with the hall owner (including rent negotiations);
    - scheduling of bingo events;
    - purchasing of paper;
    - renting, leasing or purchasing of bingo equipment;
    - advertising;
    - setting the bingo program (prizes);
    - determining eligibility for membership (see below);
    - running the concession when it is not run by the hall owner.

23. The bingo manager cannot be a member of the board of directors. Remuneration will be on a straight salary basis rather than a share of proceeds and the association may wish to consider bonding the manager.

24. The manager's duties will include the day-to-day running of the bingo hall under direction of the bingo association, including the hiring of callers (the association may also wish to consider bonding the callers).

25. Associations are encouraged to negotiate a flat rate monthly rent, with a provision that an adjustment may be made if additional bingos are

scheduled (to cover increased variable costs). There will be no payments to hall owners on the basis of a percentage of gross spending.

26. Associations will be required, prior to operating, to present their budgets for income and expenses to the proposed licensing authority for approval. The authority will review these plans in light of market conditions.

27. The association will submit a plan to the licensing authority, prior to operating, regarding the number of organizations that will form the membership, the principles for entry and exit of association members, and the participation (voting) of members within the association.

28. The above plan shall be based upon equity among members, efficiency of raising funds for specific charitable purposes, and the principle of allowing fair access to charities within the community to bingo as a means of raising funds.

29. The licensing authority shall receive reports on all exit and entry of member organizations of the bingo association and other information pertaining to the monitoring and policing of association membership.

30. Notwithstanding the existence of the association, individual organizations will make application for licences (there will be no umbrella licensing).

The Role of Local Government

The Commission received representations on such matters as business licence disputes, parking problems, Sunday bingo, hours of operation, and licensing of small bingos.

It is recommended that:

31. All bingos, irrespective of frequency and prize limits, be licensed and regulated by a provincial licensing authority.
32. No bingo licences be issued for Sunday with the exception of halls where bingos are held infrequently (no more than two bingos per week).
33. Hours of bingo be limited to 12 noon to 12 midnight (bingo sessions must begin and end during this period).
34. The licensing authority shall honour the wishes of local governments which pass bylaws to further limit the hours or days of operation.

Nevada Tickets

Since first licensed in late 1982, spending on nevada tickets has increased rapidly in bingo halls and at other points of sale. The Commission noted that many organizations are in favor of the retention of nevada tickets at bingo halls. Nevadas have become the main (and often the only) way that charities have to raise revenues. This acceptance of nevadas by sponsors appears, however, to be more related to sponsors' lack of a reasonable return from bingos and less to their specific approval of nevadas as a desirable way to raise funds. The existence of nevadas complicates the sponsor's attempt to negotiate a fair return from bingo since the sponsor is not expected to complain about the bingo proceeds if nevadas are profitable. The hall operator currently feels little obligation to ensure the sponsor a reasonable return on bingo. Further problems were the lack of accountability for funds raised from nevadas, questionable disposition of portions of unused boxes, fraudulent use of nevadas by players, and the negative effects upon bingo players due to nevada sale practices and impulse buying.

After considering views of Inquiry participants and the policies of other provinces, the Commission recommends that:

35. The sale of break-open (nevada) tickets be banned in all bingo halls.

36. The proposed gaming authority monitor the bingos closely to see that sponsors are getting sufficient revenues and, if this is not the case, the gaming authority may consider raising the cap placed on the prize board to allow reasonable revenues for the charitable organization.

The Future

Having met, to a greater or lesser degree, all the terms of reference for the Inquiry, the Commission has spent some time thinking about the future of the game of bingo if the recommendations of this report are adopted. The following is what the Commission would like to see.

The largest crowd at a bingo hall will be about 300. Halls that hold less than 300 will also operate successfully and many of the organizations that have struggled unsuccessfully to keep their games going will be able to bring back their bingo nights and again raise money.

Bingo will never go back to what it was ten years ago. It will remain somewhat of a business, but the commercial gaming house environment will fade away and the bingo night will, above all things, be a social event. Players will still be thrilled with the prospect of winning a $1,000 jackpot even though the dream of winning $20,000 or a car through the numbers on a bingo card will have evaporated. Since break-open tickets will not be peddled like peanuts, the bingo player will not spend as much for the evening out.

The commercial operator/owner will become merely a hall renter and will no longer be the dominating figure at a bingo hall. There will be little difference, if any, between commercial and non-commercial halls.

Bingo, along with other gaming activities, will become a more controlled and accountable game. The gaming authority will ensure that licensing provisions/regulations are observed, right from the initial application for a licence down to the accountability for expenditure of money on charitable purposes. The authority will function very adequately on the licensing fees it collects which, for bingo, will continue to be 2% of prizes. The principle of devoting these funds to the control of gaming will be accepted by the public who remember how the game once was nearly out of control.

Bingo associations will successfully manage the bingo hall operations and will help ensure that their members are truly in need of funds for charitable purposes. The associations will train volunteers in running bingos.

With bingo operating on a smaller scale and being more controlled, many of the former concerns of local governments and many of the social problems that were associated with bingo, will be considerably lessened.

CHAPTER ONE

INTRODUCTION

The Saskatchewan Commercial Bingo Inquiry, authorized by the Lieutenant Governor in Council of the Province of Saskatchewan under The Public Inquiries Aot, presents its findings in the following report. This chapter introduces the problems that gave rise to the calling of a public inquiry and outlines the process used by the Commission of Inquiry to examine the areas laid out in its terms of reference and to prepare this report.

An Historical Note

The game of bingo, the way it is played and the way it is controlled under legislation, has had a long history in Saskatchewan. In the past five years the game has undergone a phenomenal change. It has transformed from a small scale social gathering to a significant gambling enterprise. Rather than a game enjoyed by fifty or sixty people one evening a week, there are now hundreds of bingo "regulars," people who spend $20 or more a night four or more times a week to play the game. Counting both bingo and break-open tickets at bingo halls, a player can now spend hundreds of dollars a night on gambling, if that is what the player desires. Rather than a game played in a church basement or a community hall, bingo has become a business upon which the revenues of many non-profit organizations depend and within which are tied up the investments of private entrepreneurs.

Overall, there has been a remarkable growth in the number of bingo events licensed and the spending of patrons on bingo. In 1980/81 total provincial spending on bingo was $7.6 million compared with $33.5 million in 1984/85. Taking into account the larger bingo events (where the prize value is $1000 or more and the licence is issued by the Province rather than a local government), the number of licences has grown from 75 in 1980/81 to 1906 in 1984/85 (recent figures may well underestimate actual levels since they do not account for unlicensed events and they are based on the submission of final reports by licencees). There is good reason to believe that actual spending during the 1985/86 fiscal year might well be $40 million or more on bingo.

The licensing of bingo has also changed, along with the game itself. Prior to 1970 bingo was not a licensed activity in Saskatchewan or other provinces and, strictly speaking under the *Criminal Code of Canada*, was gambling and was therefore illegal. In 1970, however, the *Criminal Code of Canada* permitted provincial Lieutenant Governors in Council to make provisions for the licensing of lotteries (including bingos). Section 189 of the *Criminal Code* said that gambling was illegal and Section 190 of the same Code made certain exceptions to 189. Specifically, certain forms of gaming for purposes of raising charitable proceeds could be licensed under provincial authority (bingo is regarded as a form of lottery).

The *Criminal Code* does not set any penalties for infractions when the provisions of the licence are not kept by the licence holder; presumably either the licence is void and the charitable organization can be charged under Section 189 of the *Criminal Code*, the existing licence can be withdrawn, or future licences can be withheld. Chapter Three of this report discusses some of the problems that have occurred due to the legislation that governs licensing. There is, however, potential for improvement due to the federal Bill C-81, which amends relevant sections of the

Criminal Code and which was enacted during the writing of this report (see Chapter Three).

In 1977, responsibility for bingo, casino and lottery licensing was transferred from the Saskatchewan Department of the Attorney General to the Department of Consumer Affairs. Prior to 1982, all licences issued by the Department carried a $10 licence fee. Prize structures, profits and gross spending had no bearing on the fee charged. This fee is not a tax; it is regarded as a sum collected that is intended to cover costs of issuing the licence and undertaking any investigations to ensure provisions are being followed, etc. There has never been (so far as the Commission could determine) a one-to-one matching between the amount of revenue coming in from licences and the expenditures of Consumer and Commercial Affairs upon the licensing and investigation of gaming (Submission S-179, O. A. MacGillivray, Saskatchewan Consumer and Commercial Affairs).

Licence applicants had to indicate, among other things, where and when the event would be held and the charitable purpose of the organization that was making application. Much the same procedure is followed today, although there has been a change in administration of licensing which, recently, involves the use of a computer for issuance of the licence, accounting for licence fee cash, and preparation of summary reports. Prior to 1982, the Department excluded certain groups, such as trade unions and political parties, from acquiring bingo licences. The policy was then changed to one where virtually any group that alleges it has a charitable purpose could be licenced, providing the benefits would not go directly to supplement the income of group members.

In August of 1982 the first commercial bingo hall in Saskatchewan opened its doors to patrons in Regina. Later that year, perceiving the growth in gambling and the administrative implications, the Government revised its licence fees (see Appendix B). Instead of a flat $10, the fee now became "user pay," a levy of 2% of the retail prize value awarded for bingo sessions.

Early 1983 saw the first commercial bingo hall opened in Saskatoon and, during the rest of the year, one hall after another opened across Saskatchewan. Expenditures on bingo and revenues earned by charitable organizations through bingo increased rapidly. Early in the year break-open tickets (commonly called "nevadas") were licensed in Saskatchewan; a significant proportion of the sales of these tickets occurred in bingo halls.

In 1984 Lottery Licensing Amendments were directed particularly to cover licensing of charities to hold bingos in commercial hall operations (see Appendix B). Included in these provisions was the following:

> (6) In no event shall the expenses, other than prizes, associated with a bingo event held in a commercial hall exceed 20% of the gross revenue of the event.

Further to this provision, the Licensing and Investigation Branch informed licencees that the guideline for bingo revenue distribution was 60% prizes, 20% expenses, and 20% share for the charity. Clearly, there was concern about the proportion of proceeds going to charity from bingo; of the bingos licensed by the Province, 20% of gross went to charity in 1983/84 compared with 23% the previous year and, in 1984/85, the charity share dropped to 13% of gross revenues. Initial estimates for 1985/86 indicate that the charity's share may be less than 9%. While the provisions in the Order in Council referred to limitation on expenses of individual events, the Department generally would try to influence charities to ensure that guidelines were kept on a per licence basis, which might involve numerous bingo events. As some of the following chapters indicate (see especially Chapter Five), this strategy of persuasion has not appeared to be particularly effective.

A growing public concern about bingo led to two actions by the Government. First, a moratorium was called as of March 21, 1985 on the issuance of licences for bingo events at any commercial operation not already existing upon that date. Second, on May 15, 1985, the Minister of Consumer and Commercial Affairs, the Honourable Joan H. Duncan, called an inquiry into commercial bingo operations under The Public Inquiries Act of the province. In her announcement, the Minister cited two major concerns:

1. The impact which commercial bingo operation have on traditional community bingo halls, the non-commercial halls. This is a particular concern in many smaller communities where church and community halls are commonly used for local bingo activities.
2. There is public concern over the distribution of revenue between commercial bingo hall operators, prizes and the sponsoring charitable organization.

The Minister went on to state, "While the inquiry will focus on commercial bingos, the terms of reference of the inquiry are broad and will allow for the review of bingo operations in general" and that "the inquiry may identify further issues."

The Public Inquiry

The Inquiry is authorized under The Public Inquiries Act of Saskatchewan. Included in the powers granted the Commission are the abilities: to summon witnesses; to compel attendance of witnesses to provide verbal or written information; to acquire the services of experts; and to produce documents such as this report.

Order in Council 596/85 of May 29, 1985 appointed the commissioners and set out terms of reference for the Inquiry. The terms of reference were regarded by the commissioners as indicative of the Government's intention in calling an inquiry, but the Commission also noted the introductory paragraph which stated that the Commission should "evaluate, study and report" regarding specific terms of reference "without limiting the generality" of its inquiry into "the role of commercial bingos in the Province of Saskatchewan" (for more discussion of the terms of reference and the extent to which the Commission has been able to address them, see Chapter Eight).

The first task of the Commission was to understand the terms of reference. The Commission met to study the terms and to list any questions. Then it met with the Department of Consumer and Commercial Affairs to resolve any outstanding questions. If there were to be substantive instances where the terms of reference were contradictory, confusing, or inconsistent with the Minister's public statements regarding the function of the Inquiry, the Commission would propose to the Minister that certain amendments should be made by the Lieutenant Governor in Council. No such changes were, in this instance, regarded as necessary. Once it had gained a full understanding of the terms of reference, the Commission became independent of the Government.

The Commission acquired staff at various stages of the Inquiry period to assist in carrying out its functions. All staff were responsible to the Chairman of the Inquiry during the performance of work connected with the Inquiry. There was a clear understanding that all matters leading to the development of recommendations by the Commission were to be managed independently of the Government. Ralph Smith and Don Wincherauk acted jointly as secretary/co-ordinator for the Inquiry. David Sparks of the Education and Communications Branch of Consumer and Commercial

Affairs assisted with public hearing arrangements. Bill Derby and Edith Berg of the Education and Communications Branch assisted with advertising and other communications. Rolan Solie undertook certain statistical, file search, and other assignments. Pat Jeffries, Pam Hudak and Mary-Elizabeth Sinclair typed correspondence and carried out other secretarial assignments. The Planning and Policy Branch (particularly Debbie Kennedy), the Licensing and Investigation Branch (particularly Ann Plante and Bob Anderson), and the Education and Communications Branch assisted the Commission through undertaking assigned projects such as file searches and computer analyses, in providing advice on procedural matters, and in other ways. Members of the Inquiry would like to thank the above-mentioned individuals for their outstanding work.

Ralph Ottenbreit provided independent legal counsel on certain matters referred to him by the Commission.

The Commission met periodically between July, 1985 and September, 1985 to review files and other research material relating to the subject matter of the Inquiry and to come to an understanding of the legislation, guidelines and administration concerning bingo.

A newspaper advertisement calling for written submissions and for notices of intention to participate in public hearings was placed in August. The deadline for receipt of written submissions was September 27; this date was later extended and written submissions were accepted during the public hearings. In total, the Commission has received 513 written submissions, many of them from organizations representing numerous individuals.

In order to ensure that participants in the Inquiry had a full understanding of the subject matter, a brochure was developed (see Appendix F) and was mailed to approximately 4,000 individuals and organizations or was sent to those who asked about the Inquiry by phone or mail. A telephone number that could be called collect from anywhere in Saskatchewan for information about the Inquiry was advertised. Hundreds of calls were received. The Commission developed specialized questions and questionaires for all organizations holding bingo licences from the Province, all commercial bingo hall operators and all major non-commercial bingo hall operators (see Appendix G). These questionaires were intended to ensure that those with a major involvement in bingo in Saskatchewan would fully participate in a comprehensive way in the

Inquiry. All the hall operators contacted subsequently responded with a submission and an appearance at a public hearing, with the exception of two operators who only appeared after being issued subpoenae.

Public hearings were held in 11 Saskatchewan communities. The locations and dates of public hearings were advertised in newspapers and on posters. Each hearing day had sessions at 2:00 p.m. and 7:00 p.m. Hearings were held at: Prince Albert (Oct. 8), La Ronge (Oct. 10), Meadow Lake (Oct. 15), North Battleford (Oct. 16), Lloydminster (Oct. 17), Yorkton (Oct. 21), Weyburn (Oct. 22), Moose Jaw (Oct. 23), Swift Current (Oct. 24), Saskatoon (Oct. 29, 30, 31), and Regina (Nov. 5, 6, 7).

Hearings were usually well attended and participation levels by a range of interests were always exceedingly satisfactory. The evening session often lasted until after 11:00 p.m. and some people attended not to participate but because they found the issue interesting. In all, 214 witnesses appeared before the Inquiry at the public hearings.

The Commission attempted to bring about a prevailing atmosphere of informality at public hearings. Due, however, to the extent of public interest and the need to allow all those interested a chance to take part, there were certain rules that were observed. There was an order of appearance of witnesses: first, those who were speaking to written submissions already received by the Commission; second, those who had indicated in advance an intention to participate. The witnesses in these first two categories were sworn in by the Chairman. Finally, time was set aside at each session for an informal appearance by anyone present who wished to make a statement and these witnesses were not normally sworn in. All comments were addressed to the Chairman. The proceedings were recorded on cassette tape.

The Commission was concerned at various times during the receipt of written submissions and appearances of witnesses at public hearings about alleged cases of improper influence. More than a dozen telephone calls were received, most anonymous, where the caller alleged that there was a personal threat or else a threat that an organization might not get a future booking at a bingo hall. The allegation was that submissions should include certain points or else the submission should be withheld rather than submitted to the Inquiry. There was also, around the time of public hearings, an advertising blitz to support bingo halls. At public hearings some sponsors indicated they were asked to pay for these advertisements even though they objected to this.

Several witnesses came forward at public hearings to claim that they had been threatened prior to the hearing or that they were aware that their appearance could jeopardize their own futures or that of their organizations. In one case, a letter sent to sponsors by a hall operator was understood by some organizations as a demand to support the bingo operation or else future bookings might be affected. A circumstance similar to this happened in a second community.

In all such cases, the Commission advised that any attempt of one party to coerce or improperly influence the submission of another party would be considered an interference with The Public Inquiries Act. If there was a personal threat alleged, commissioners or staff advised the recipient that a report should be made to the police. A letter was sent out to all existing holders of bingo licences advising of what action could be taken if submissions were witheld or prepared under conditions which forced the licencee to be less than candid (see Appendix H).

Some sponsors, including a service club, expressed a wish to speak privately with commissioners but declined to provide any information which would become public. Such offers were of little use to a public inquiry which must base its decisions on public statements and documents. Commissioners recognize the dilemma of organizations committed to raising large amounts of money for charitable causes who are depending on revenue from bingo and to do this must maintain a good relationship with the hall operator. Nonetheless, commissioners were disappointed that raising money, even for needed charities, would take precedence over what might be considered a public duty to assist the Inquiry.

While the Commission had, at various times, some concern that the evidence it received might be biased or that certain information was being witheld, due to either an actual or perceived threat of some form, the Commission is confident that it has been presented with a satisfactory volume and quality of public involvement to prepare this report. Many individuals and groups spoke candidly at public hearings and sent in detailed submissions, even though some immediate interests might be sacrificed by them in exchange for what they perceived could be a long-term social benefit, should gaming policy changes be made by the Province.

The public media provided unbiased and detailed reporting in every community the Inquiry visited. The Inquiry received extensive coverage - more than what might have been thought possible at the time the Inquiry was called and when there was not a general public understanding of the growth of bingo and gaming in Saskatchewan. Media members were at all times courteous and thoughtful, and they assisted in spreading an awareness of the issues among the general public, a function which is particularly relevant to the public inquiry process.

Following the public hearings, the Commission spent long hours reviewing the issues, undertaking additional research, listening to tapes, arriving at conclusions and, finally, writing and revising this report.

CHAPTER TWO

SOCIAL CONCERNS

Introduction

As large scale bingo halls have spread across Saskatchewan, and as the spending by players on bingo and nevadas has shot upward, significant social impacts have been generated. Many individuals and groups wrote to or appeared before the Inquiry to express their opinions. Perspectives varied. Occasionally, participants argued that the social benefits of bingo were paramount. Other participants said the social disadvantages and costs exceeded the social benefits.

Certain benefits of bingo, such as the revenues generated for charity, can be quantified. The social costs, on the other hand, tend to be less quantifiable and also were subject to different interpretations. For example: is bingo a social advantage or disadvantage for people who have lower incomes? How would lower income players spend their income and time if not at bingos?

The Commission recognizes that there are certain questions on the net social costs of bingo that cannot easily be resolved. The Commission has found, however, that the direction bingo had taken in Saskatchewan was towards unhampered expansion (the development of new facilities, the increase in player expenditure) without due consideration of the use of controls to mitigate the social costs involved. On balance, the social costs of bingo currently outweigh the social benefits. The time for policy and administrative action is now, in order to ensure that benefits of gaming activity to society exceed the costs.

The remainder of this chapter is an identification and discussion of some of the social benefits and costs of bingo. The chapter concludes with a list of objectives resulting from the Commission's concerns.

The Revenues Generated by Bingo

During a period of federal and provincial budget constraints, and when door-to-door fundraising drives struggle to achieve their goals, bingo has benefited many organizations. The overall funds to charity resulting from the game have increased just as the overall spending on bingo has increased since commercial halls began operation in 1982.

The table below provides more detail of this trend:

Year	Gross Bingo Revenue	Allocation to Charity	Percent
1980/81	$ 1,999,424	$ 534,543	27
1981/82	2,199,744	603,230	27
1982/83	4,599,167	1,154,400	25
1983/84	11,965,045	2,027,606	17
1984/85	30,365,588	3,958,441	13

The benefit to charitable organizations has increased, but the level of benefit in recent years (especially the 13% of gross in 1984/85) does not seem reasonable. The prospect of even a smaller share of gross by charity in 1985/86 (less than 9%) is a serious ground for further concern.

Nevertheless, the total funds going to charity have been substantial. Sponsors cited many programs which they have been able to carry out only because of bingo.

Bingo has freed many groups from the need to solicit funds by going door to door (and thus has relieved homeowners and apartment dwellers of some of the numerous requests for donations).

In the past, many fund raising drives for charity were highly labour intensive. For example, bake sales, bottle drives, and potluck suppers, although of great value to the community, are time consuming and demand a great deal of work. At a time when many Canadian families have both family heads working, this effort has become increasingly difficult. Bingo has offered non-profit organizations an opportunity to raise funds without expending as much time or energy. Funds can be raised in a few bingo sessions that in the past took weeks of hard work. Presumably the organization, if it delivers its own programs, can then direct more time and effort to service delivery rather than simply raising funds.

Admittedly, there were participants at the Inquiry who said that outright gifts to charity without the expectation of something in return benefited the giver as well as the receiver. By comparison the bingo player at the large bingo hall often has little or no thought of the charitable purpose of the bingo proceeds. Many players do not even know who the sponsor is during a bingo event. Is there a benefit to the giver in the latter case?

The Disposition of Charitable Revenues

While the total contribution of bingo towards the raising of charitable funds is regarded by some as the prevailing benefit, many Inquiry participants questioned whether or not funds were being spent on worthwhile charitable causes. Some questioned the efficiency of bingo as a means of accomplishing charitable purposes.

Out of the total spent on bingo, large amounts have been paid out for prizes, promotions and hall expenses. Of the small portion which remained for the sponsor, the Inquiry heard of funds being spent on socials, wind-up parties, pleasure trips and leather jackets for club members. Participants in the Inquiry said that money that was acquired on the condition that it benefit the community was, in fact, used in a self-fulfilling way for the individuals who raised it.

There were cases of hard-working, civic-minded individuals who seemed to lose sight of the charitable purposes of their organization. In one case a community group worked a bingo every night for five and a half months. Arriving from their day jobs, the group members immediately set to work, often without supper. As the bingo session drew to a close, beer and pizza were purchased from the bingo revenues for the group members. The total bill for food and refreshments for five and a half months amounted to over $15,000 or roughly 22% of the organization's net bingo revenue. The workers being so rewarded were parents of the youth who were directly benefiting from the funds being raised.

Thus, not only is the efficiency of bingo as a charity fund-raiser in question due to amounts paid in expenses to hall operators and in prizes to bingo players, but efficiency is dubious as a result of certain frivolous expenditures by groups or through expenditures which do not seem truly charitable (see further examples discussed in Chapter Four).

Even when funds go to purposes which seem legitimately charitable, questions about efficiency were raised. The Regina Family Service Bureau's submission argued that bingo tended to result in a transfer of income from the poor (the majority of players) to the poor (through charitable organizations); the submission proceeded to question the efficiency of this transfer since the bingo charity dollars tended not to go into operating funds of human service delivery agencies, where the greatest need for funding exists. Still other submitters said that bingo tended to transfer income from lower income persons to middle or upper income persons.

Business Impact

The large bingo halls have generated an additional amount of business in the larger Saskatchewan communities where they are located. This business expansion is regarded by hall operators and others as having benefits, such as the creation of employment, the purchase of supplies and equipment and the use of vacated buildings.

Other participants of the Inquiry, however, questioned the value of bingo halls as a means of creating spin-off benefits for the communities in which they are located. There was little evidence that bingo players tended to purchase goods and services from retail outlets or restaurants that are in proximity to bingo halls. When the bingo hall is in a mall, parking lots become congested and the viability of other mall merchants can be seriously endangered (see Chapter Seven for more detail). One businessman appeared before the Inquiry in Prince Albert to indicate that he was noticing customers could not pay their bills due to their spending on bingo. He had noticed that customers owing him money continued playing bingo.

Impact on Horse Racing

The Saskatchewan horse racing industry has experienced a substantial downturn in gross spending on horse racing in the same period when gambling at bingo halls has shown dramatic increases:

Year	Bingo	Horse Racing
1982/83	$ 9,319,437	$19,975,768
1983/84	$15,951,059	$18,023,897
1984/85	$33,489,441	$16,368,529

A submission from the exhibition associations in Regina and Saskatoon emphasized the importance of horse racing to the economy of Saskatchewan as well as to the quality of life. It states "there can be no doubt that the proliferation of bingo halls has hurt racing attendance severely. Unless the steep slide in revenues can be halted, Saskatchewan's racing industry as we know it today is bound for extinction."

The submission described the extent to which horse racing is controlled by regulation and the effectiveness of those regulations in "removing the potential for irregularity from the sport."
In a comparison with bingo, the submission added "We welcome the competition, but wish to play by the same

rules." And later "in summation, we would like to stress that lack of regulation, specifically as it applies to bingo, is causing great concern about the ability of racing to compete in an atmosphere of fairness." (S-507)

Impact on Traditional Bingos

Large scale bingo halls have definitely harmed small community halls and traditional church bingos. Numerous individuals and groups made representations on this issue to the Inquiry.

For years, charitable groups have run bingo games out of their halls. Bingo has been a form of entertainment and a means of raising funds for worthwhile community projects. The new commercial halls have endangered the very existence of these more traditional halls and all they represent.

A case in point is evident in the submission from the Town of St. Walburg. For approximately 15 years, the Elks Club of St. Walburg has held a bingo every Friday evening. To the community this meant several things. Playing bingo Friday evening became a social event.

For many, especially the elderly, it was a night out; a chance to meet friends and neighbours. Secondly, bingo provided the Elks with a means of raising funds for charitable causes. Over the years, money raised from the bingos has been used to support local youth clubs such as the 4-H Club, to contribute towards the development of a town park and, recently, to help pay for the construction of the town recreation centre. Furthermore, there were economic spin-offs to the community. Those attending bingos often ate supper in town and purchased gas and other articles from local merchants.

In the past three years, however, commercial bingo halls have opened in North Battleford, Lloydminster and Meadow Lake, all approximately within an hour's drive of St. Walburg. The status of the Elks nightly bingo has been jeopardized. Forced to compete with the commercial halls and their growing jackpots and larger prize boards, the Elks Club has increased its jackpot to retain patrons. The result is that there is now less money for charitable causes in St. Walburg. As the funds raised for charity decrease, so does the willingness of the Elks to run bingos. Therefore, the social and economic spin-offs that once benefited the community are now flowing out of the St. Walburg area.

The St. Walburg submission also stated that the service clubs and church groups of the area were facing increasing problems in raising funds for charitable projects. Money flowing to the commercial bingo halls was not being returned to the community and this in turn was threatening the existence of the service clubs. The submission concluded: "without service clubs and church groups small-town Saskatchewan or for that matter city-Saskatchewan would not be what they are today." (S-144)

Community groups that once used bingo as a major source of collecting funds have seen their revenue drop. In Weyburn, bingos sponsored by the Oddfellows and Rebeccas have for years funded major community projects, as well as eye treatment and other research. In 1983, these groups raised $2,000 from bingo; as of July 1985 their bingos were running a deficit of $800. This drastic reduction in funds has limited the ability of organizations such as these to give. (S-310)

In Saskatoon, the Indian and Metis Friendship Centre faced a similar problem. Their submission states:

> Bingo has been one of the centre's primary fund-raising activities and the introduction of commercial bingos has greatly diminished bingos used in this capacity. Because bingo is no longer a viable fund-raising activity, non-profit organizations in general have virtually disappeared from the bingo scene. They simply cannot compete with the larger commercial establishements. (S-445)

As a result of large commercial bingo halls, many groups now lack the funds to carry on with their projects. In Saskatoon, for example, St. Mary's Church uses bingo to raise funds to operate and maintain the church and parish hall. In 1981, 50 bingos raised $46,554; in 1984, 49 bingos resulted in a net revenue of $13,197, a drop of 72% (S-358). This substantial decline in bingo revenues, according to church members, is directly related to the existence of larger commercial halls. St. Basil's Parish in Regina faces a similar problem. Holding two bingos a week for a year, St. Basil's raised more than $170,000 in 1981. Money raised from bingo over succeeding years was used to help pay for the construction and maintenance of the church hall and later to purchase land for a senior citizen's home. In 1984, revenue slipped to $70,000 and as of August 1985 the parish was running a $4,000 deficit on its bingos. Father C. Kucharek believes that this drop in revenues can be attributed to the existence of the larger bingo halls and that, in the absence of other lucrative fund-raising activities, funding for the senior citizens' home and other such projects will eventually have to come from government (S-248).

Numerous Saskatchewan charitable groups, large and small, have faced the same problems as St. Mary's and St. Basil's.

Mayor Bridger of Meadow Lake spoke directly to this issue when he told the Inquiry:

> In regard to the Lions, Elks and Kinsmen they have done a lot of work in this community and it is noticeable now by its absence because they are not able to raise the kind of money they used to and the projects they used to take on their own are now falling upon the town and when they fall upon the town we have only two sources of income; that is taxes and provincial government grants. Believe me, we will be going after the provincial government for more grants before we will raise the taxes if we have to start taking over some of the things that the charitable organizations in this town need to help with. (Meadow Lake hearing, Tape 11:Side A)

Benefits and Costs to Individuals

The Inquiry had many representations concerning the social impact of bingo on its players and on those individuals who are affected by the habits of players.

Many players value the game of bingo as a social night out and a chance to be with friends. Mrs. Oatway, a resident of Saskatoon and an avid bingo player, told the Inquiry that the bingo hall was:

> one place where women who are alone can go without any talk about them. They can go and be accepted. It is a place for the older people to go. (Saskatoon hearing, Tape 35:side B).

Mrs. Kaye, a resident of the Yorkton area, told the Inquiry:

> I can go into a bingo hall with a problem. Buy my card, sit down and play for three and a half hours. My problem is gone. It (the game of bingo) is good therapy. When I come out, the problem isn't that big ... and I feel a heck of a lot happier. (Yorkton hearing, Tape 21:Side A).

Several witnesses said that bingo might keep some people out of the bars and away from alcohol. One individual stated:

> More parents (are) going home sober rather than being in the bar. It is better to go home with a dream rather than a hangover. (Lloydminster hearing, Tape, Tape 18:Side A)

On this last point, however, other witnesses argued that it does not make sense to praise bingo as a cure for alcoholism; one social problem should not be created in order to cure another.

In the course of the Inquiry there were many who argued that the amount low income and elderly persons spend on bingo is beyond their means. The average bingo player spends $18 to $30 per session (not including spending on break-open tickets). About 75% of players are "regulars" who play bingo four or more times a week. Based on these estimates, and the testimony of many regarding the socio-economic status of players, it appears that the ones who are supporting charitable causes through bingo are those who can least afford to do so.

Florence Driedger, Executive Director of the Family Service Bureau of Regina, wrote in her submission that "it has been documented sufficiently to know that it is the poor that participate in bingos." (S-106). Doris Lund, Alderman for the City of Prince Albert, told the Inquiry that charitable funds raised from bingo were raised "on the backs of the poor. Children and women are suffering." (Prince Albert hearing, Tape: 3:Side

A). Similar stories were heard in most of the 11 communities that the Inquiry visited.

Stories of mothers spending family allowance cheques on bingo and children lacking the proper diet, clothing and care were heard many times. The Circle Drive Alliance Church of Saskatoon stated in its submission:

> Many would suggest that bingo preys on those of the lower sociol-economic strata of society who can least afford the panacea of spending their limited paychecks on the vertigo satisfying trap of discovering the elusive rainbow treasure chest. (S-331)

Reverend Bob Bryce, speaking on behalf of the Battlefords' Ministerial Association, stated that his association believes that large scale commercial halls have contributed to social problems in the Battleford area. He said:

> I first became concerned about adverse social effects of commercial bingo in the Battlefords and surrounding communities through observations made while visiting. On one of the reserves I found an elderly grandmother trying to care for a whole houseful of her grandchildren; the parents were away to town at the Bingo Palace. I have found children all alone at homes on reserves fairly frequently. A common reason the children give for the absence of the parents is that they are playing bingo. (North Battleford hearing, Tape 13:Side A).

Lieutenant Don Grad of the Meadow Lake Salvation Army stated "After a couple of bingos, I have been approached by people for welfare assistance." Mr. Grad went on to say:

> Locally, it appears it is mainly the native and poor portion of the population that supports the commercial bingo halls. (S-34)

Reverend Bryce further informed the Inquiry that approximately fifty families had approached Lieutenant Joan Shayler of the North Battleford Salvation Army for assistance after spending much of their welfare cheques on bingo. Bryce also referred to the Battlefords Indian and Metis Friendship Centre:

> ...the Bingo Palace was having an adverse effect on some of their clients, that there were families without food or even furniture as a direct result of spending their funds on bingo. That poverty results from compulsive bingo playing was also the opinion of social workers contacted and that indeed there were cases of people without food or furniture as a result of spending their money on bingo. A worker dealing with young offenders indicated that lack of supervision by parents who play a lot of bingo tended to increase problems among young people who were left without much real parental contact. (Tape 13:Side A).

In a verbal presentation and written submission, Shirley Smith of the Friendship Centre agreed with the above. She wrote:

> ...since the commercial bingo has opened, it has caused a lot of hardships for families. In all our years of bingo our family workers have never witnessed problems like they have since the commercial bingo has opened in the area. The problems that have arisen is that families are selling furniture to play bingo or using grocery money to play in hoping to win the large amounts of prizes being offered at the commercial bingo. (S-326)

Many of those who play are those who can least afford it. It is also clear that many of those who participate no longer play for entertainment but to win the big prizes. Those who profit, either the hall owner, the sponsors or a prize winner, do so at the expense of the majority who play.

The Mayor of the Village of Green Lake, Rod Bishop, raised many of the points mentioned above plus others when he spoke to the Bingo Inquiry in Meadow Lake. He stated:

> A lot of people have come to me and have asked to ----- they've wanted to borrow some money so they can go to a bingo. I also know of a lot of people who will go to a pawn shop and try to pawn their

> tools just so that they can go to a bingo. Some of these are trappers. They'll try to pawn off their traps and any time that you see that type of situation happening ----- coming directly at you, you know that there is some type of a social problem that is taking place. Naturally, that is bound to diversify back to the family's responsibility. Bound to affect that family. Bound to affect the income of that family and affect the child's upbringing. (Meadow Lake hearing, Tape 9:Side A).

The final point raised by Bishop, concerning the impact of bingo on families, is particularly important. Mr. McFarland, a Saskatoon school principal speaking for the Circle Drive Alliance Church, stated:

> I have observed the impact of bingo on families in my school and I would say it is one of the major contributors to the disintegration of the family unit.

He went on to say:

> Parents are gone, youngsters are left alone; young children are left in charge of younger siblings until the early hours of the morning. We've found that some children that find themselves in that situation stay away from home. (Saskatoon hearing, Tape: 41:Side A).

McFarland believes that the lack of adequate parental care can lead children to drugs and delinquency.

Participants in the Inquiry argued that bingo is a form of gambling and like any other form of gambling there is the possibility of addiction and problems affecting not only the player's life but also family, friends and those who come in contact with the player. Bingo has its limits, as it is only possible to play so many cards at one time, but the purchase of nevada tickets does not have any such limits. At each hearing there was testimony about players spending hundreds of dollars on these nevadas. Some submitters said that players could become so preoccupied with bingo and nevada tickets that it could become an addiction as dangerous as alcoholism or drug dependency.

Others appeared before the Inquiry to say there is a moral cost to the individual and to society due to the growth of bingo and other forms of gambling.

J. Lindsey Nimmons Jr., Pastor of the Discovery Baptist Church of Regina stated:

> Gambling or bingo is wrong because it is forbidden by the eighth commandment which says "Thou shalt not steal." It puts money and things into a man's possession for which he has not worked. It is a form of stealing from another person or other persons." (S-107)

Father Wagland of La Ronge stated:

> ...I believe all churches are feeling that bingo and lotteries, which are developed from bingo, I think, have become a disease in our society, in fact, it has become an epidemic. (La Ronge hearing, Tape 6:Side A).

Crime as a Social Cost

Another concern expressed by some was that commercial bingo allows a crack through which organized crime could enter (S-474, Outreach Committee of St Pauls). The cash flowing through a commercial hall ranges from one to five million dollars per year. Traditionally bingos have been operated by charitable groups under a system of trust. There have been no audits and very few controls to prevent slippage of funds. This is a climate which could be very attractive to criminal elements.

Objectives

As a result of its consideration of social impact, the Commission has developed certain objectives to remove or lessen some of the social costs of bingo while retaining the social benefits. The following objectives have helped the Commission to develop recommendations in the chapters which follow.

- The proportion of gross bingo revenues going to charity should be increased.
- Funds should go only to purposes which are demonstrably charitable.
- The efficiency and the accountability of the transfer of funds from bingo players to charity should be improved.
- Controls should be implemented so that small community and traditional bingos will, once again, become viable.
- The bingo hall should become less of a gambling parlour and more of a place of entertainment; there should also be a lessening of the incentives which entice players to spend such large sums during a bingo event.
- The government and the licensing authority should review and respond to the ongoing concerns of local governments and interest groups on the impact of bingo.
- More controls should be exerted on bingo to ensure regulations (provisions) are observed and so that crime or other undesirable spin-off effects do not result.

CHAPTER THREE

BINGO PRIZES AND THE SALE OF PAPER

Issues frequently raised both in written submissions and at the hearings concerned the amount paid out in prizes in a bingo session and the accumulating jackpots. Large prizes and accumulating jackpots have been significant factors in the increasing popularity of bingo in Saskatchewan. They have also caused serious problems.

Bingo Prizes

Large bingo halls came into existence in Saskatchewan in 1982 and their numbers increased significantly during the following three years. The average prize value per event increased from $1,490 in 1982/83 to $2,795 two years later. Further to the following table, it appears that prizes have continued to rise in 1985/86.

Bingo Prizes

	Number of Events	Average Value of Prizes	Prize Value Per Event
1980/81	742	$ 999,583	$ 1347
1981/82	1050	1,111,447	1058
1982/83	1735	2,585,802	1490
1983/84	3391	7,393,539	2180
1984/85	7039	19,676,325	2795

With the growth of commercial bingo halls since 1982, there has been a significant increase in the total amount of prizes paid to the winners. During this period the percentage of gross spending in bingo halls paid out in prizes has steadily increased and the percentage remaining for the sponsoring charity has steadily decreased.

Percentage Distribution of Bingo Revenues

	Prizes	Expenses	Sponsoring Charity
1980/81	50	23	27
1981/82	51	22	27
1982/83	56	19	25
1983/84	62	20	17
1984/85	65	22	13
1985/86 (8 months)	70	21	9

Large bingo halls were able to offer much larger prizes than had been offered in the community halls. As their numbers increased there was increasing competition among the halls for players. The large halls operated by service clubs became equally competitive with the commercial halls and, in fact, they were often leaders in terms of prizes and jackpots. All large halls began offering jackpots to which amounts were added each session until won. Jackpots accumulating to $20,000 or more have been common. In addition to the cash prizes there were prizes of furniture, cars, trips, gold bricks, American currency and diamond rings.

From the onset of the large halls, the smaller community bingos found it difficult to compete and steadily lost players and revenue. Within the large halls, however, the sponsors were delighted with the amount of bingo spending and the amounts which they were earning as sponsors.

It should be noted that Section 190 of the Criminal Code permits the licensing of bingos and lotteries providing they are conducted and managed by charitable organizations and the proceeds are used for charitable or religious purposes. In practice, however, the hall operator determined the prize boards and the marketing strategies. In most cases they were, in fact, conducting and managing the bingos (see Chapter Six for more information). The sponsor was simply providing its name and licence and the manpower to run the events.

As the number of halls increased and the competition for players became keener, the hall operators raised the prizes. As the prizes increased, the amount remaining for the sponsor decreased. The sponsor only made money if there was money left after paying the prizes and the hall operator's expenses. The sponsor had no control over either the prizes or the expenses. Often bingos operated at no profit to the sponsor or even at a loss. Sponsors tolerated this because they were making money on the nevada tickets. The legal parameters were being stretched or even broken in terms of the bingo: the licence was granted so that the sponsor could raise money for charity and in many cases nothing remained for the sponsor's charitable purposes after the prizes and expenses were paid.

At every hearing this complaint was expressed. Sponsors said the prizes were too high. Hall operators said the prizes were too high. Commissioners asked what the reasons were for not bringing the prizes down if everyone agreed that they were too high. The answer seemed to be that unless everyone reduced the prizes those who unilateraly reduced them would lose their customers. Lack of legislated prize limits would allow the very large halls to force the others out of business (and at the same time force all the smaller community bingos out of business).

A problem which developed along with the accumulating prizes was the administration of trust funds. Sponsors for each bingo contributed amounts towards the various carry-over prizes - jackpots, jumping jackpots, junior jackpots, cars, trips, etc. Sometimes the amounts were as much as $700. Usually this money was left with the hall operator who looked after the funds until the jackpots were won. The possibilities here for slippage of funds are obvious. The Department began recommending that trust accounts be used and that signing authorities be named from sponsoring groups. This was only a partial solution since many signatories routinely pre-signed blank cheques and left them with the hall manager ready for when a jackpot was won. Commissioners were appalled that pre-signing of cheques had been condoned by Department officials on at least one occasion. A signing authority in Saskatoon was surprised when commissioners advised him that by pre-signing the blank cheques he had left himself open to prosecution if the money was wrongfully spent.

The commissioners were also concerned that in no case had there been an accounting back to the sponsors at the end of the year to show the amounts paid into the fund and the amounts paid out for prizes. Some sponsors were concerned about the handling of the trust funds but many were not aware of the possibilities for mismanagement of these funds.

The Inquiry sympathized with W. Slough of Saskatoon, who spoke to the issue of trust accounts:

> ... the only thing that always bothered us was the trust accounts; not that we didn't trust the owner of the halls, but it made us uneasy about the fact we had no way of knowing if all that money went to prizes or if the halls ever lost it. The only thing I'd like to see is a financial statement at the end of the year given to the clubs. (Saskatoon hearing, Tape 37:Side A).

Yet another problem associated with accumulating jackpots is the possibility that bingo paper may be manipulated so that jackpots are won less frequently. It has already been concluded that a large jackpot is important to a bingo hall's ability to attract large numbers of players. When a jackpot of $20,000 is won a new one will be started with a much smaller amount of money. In this case bingo players may frequent another hall with a larger jackpot. Therefore it is in the interest of the hall owners and the sponsors that the jackpot be won less frequently. By manipulating the bingo cards it is possible to reduce the chances of the jackpot being won. Tom Nellis, a distributor of bingo paper, pointed out in his submission to the Inquiry how bingo cards could be manipulated.

> The odds of the jackpot being won in 51 numbers are quite good if all cards are

> different. If the cards are purposely sold so as to repeat all cards on the floor once, the odds of the jackpot being won in 51 numbers are reduced by 50%.
>
> By duplicating cards, ... (this) effectively reduces the chances of the large growing jackpot being won. This growing jackpot is what is used to compete for and attract larger crowds, and yet a crowd of 800 people in the largest hall may have no more of a chance at the jackpot than a few hundred players in a smaller facility. (S-484)

The above is just one example of how the cards can be manipulated. Such activity is clearly unfair to the bingo player.

The large prizes and accumulating jackpots resulted in many financial problems. There were also social concerns expressed at the hearings about the negative effect of the large prizes on individuals "seeking a dream." Concerns were expressed that the large prizes were making bingo halls less of a social function and more of a gambling event (see discussion in Chapter Two on the social impact of commercial bingo).

One of the options considered by the Commission was to require that bingo proceeds after payment of prizes be divided equally between the hall operator and the sponsor. This would have stimulated the hall operators to reduce the prizes in order to provide a reasonable return for the hall operator (and also the sponsor). The Commission considers that this could have been effective in providing a more reasonable return for the sponsor. This, however, would not have dealt with the problem of the large halls and would still have left them with a competitive edge which would result in the eventual disappearance of the medium sized halls (in addition to the smaller operations which now have mostly folded).

The Commission, therefore, rejected this option. (The Commission also rejected any percentage payments to hall owners (see Chapter Five)).

Recommendations

In response to the above concerns about prizes the members of the Bingo Inquiry recommend that:

1. Prize limits be established at $3,000 per session. This amount includes door prizes, promotional prizes and all other non-cash prizes.
2. Maximum prize for an individual game within a session not to exceed $1,000.
3. Accumulating prizes be eliminated.

Further Discussion on Bingo Prizes

The capping of prize boards is a trend across the country. In British Columbia, new recommendations proposed by the B.C. Lotteries Commission suggest that the prize board be set at $7,500 per session with no one prize exceeding $1,000. The Alberta Gaming Commission has set the limit at $15,000 per session. In Manitoba a ceiling has been established at $10,000 per day (there can be as many as three sessions per day). In Ontario, where there are both municipally and provincially licensed bingo halls, the former has a prize board of $2,500 and the latter a ceiling of $3,500. In Quebec the prize limit has been set at $3,500 per session. In Nova Scotia the ceiling was previously $25,000, but it has recently been dropped to $15,000 per session and the Lottery Commission is considering a further reduction. New Brunswick, Prince Edward Island and Newfoundland do not have any prize limits. Across Canada bingo is a multi-million dollar activity. All provinces face similar problems and it seems that the majority have or are moving in the same direction in regard to limiting prize boards.

Most sponsors were adamant in their demands that the prize boards be capped. The decline in their percentage of revenue and the fact that nevada tickets are responsible for most of the sponsor's revenue (see Chapter Eight) have led most sponsors to conclude that there must be a limit on the total prizes per session.

The Cities of Regina and Prince Albert also requested that prize limits be introduced. The City of Prince Albert recommended:

> That the provincial government legislate and enforce maximum prize amounts that may be offered at any one bingo session and that the maximum suggested prize value be limited to $5,000.00 (S-145)

The hall owners were almost unanimous in their call for a cap on prize boards. One group that opposed the idea was the bingo partnership of Alex McDougall and Don Holzer. (McDougall owns two halls in Regina and one in North Battleford, and is a co-owner with Holzer of a hall in Moose Jaw). They were of the opinion that limiting the prize board would not be in the interest of the sponsor, for a larger prize board attracts more players, resulting in a decline in the percentage payouts for prizes and ultimately meaning that the sponsor would receive more money than if prizes were capped. (H-9) This strategy has been successful for McDougall's halls but other hall operators disagree on its overall merits. The AMNSIS hall in Lloydminster was in favour of limiting the amount spent on prizes. In its submission to the Bingo Inquiry the group responded to the question of prizes by stating:

> Yes, there definitely should be a limit on growing jackpots and prize payouts because we feel that sometimes too much

> money is being paid out to the bingo player instead of being used to donate to community projects. (H-24)

John Atamanenko of Bridge City Bingo in Saskatoon said in his submission:

> There is a definite need to keep the prize board down to a reasonable level of approximately $3,500 nightly with no growing prizes (jackpots). (H-29)

A written submission from Stan Walt, Jim Hughston and Elaine Hughston, owners of a bingo operation in Saskatoon and Regina, stated:

> If this inquiry accomplishes nothing other than the limiting of prize boards, then it will have grasped the major problem in the bingo industry, and it will have at least taken an important step towards solving the problem. However, I must caution that limiting prize boards must not be an arbitrary stroke of the pen, there must be a great deal of thought to the limits set, and those limits must be such that the greatest number of halls in the province will benefit by them. I strongly believe that if the limit on prizes is set too high, the effect will be crippling on the smaller halls as the war will once again be on to give away the maximum prize money even if it does not make economic sense to do so.
>
> If the prize board maximum at any session is set higher than $3,000, then the entire energy of this commission and all those its decisions affect will be wasted! (H22-23)

The second recommendation, dealing with the elimination of accumulating jackpots, is compatible with regulations in other provinces. Other provinces have or will adopt the following positions: British Columbia is recommending that there be no jackpots carried over from night to night. Alberta does not allow accumulating jackpots. Manitoba allows jackpots but only to an amount where payout of the regular prizes plus the jackpot will not exceed the maximum of $10,000 per day regardless of the number of sessions per day. In both Ontario and Quebec, accumulating jackpots are not allowed. In Nova Scotia these jackpots are allowed but organizations may only carry jackpots over to the next event. New Brunswick, Prince Edward Island and Newfoundland permit accumulating jackpots.

Sponsors were not particularly critical of jackpots, but the majority of hall operators were. McDougall and Holzer favoured their retention, arguing that the jackpots helped generate large crowds and thus benefited the sponsors.(H-9) Most others disagreed with this position. Parkland Bingo Palace in Yorkton stated:

> Personally, I would advocate elimination of jackpots. Reasons: there would be no need for trust accounts, and the administering of such. It would also provide a more reasonable degree of equality between commercial and non-commercial operations. Non-commercials have the advantage and are able to start their jackpots at much higher totals than the commercial operators. (H-27)

Still others opposed jackpots on the grounds that the money going into trust accounts would be better used if it went to the sponsor. (H22-29)

Bingos with Prize Payouts over $3000

Lottery Licensing Provisions currently provide a limit of $25,000 on the prizes which may be awarded during a 24 hour period. All bingo applications involving prize values exceeding $25,000 per session must be authorized by Order In Council. From March to October in 1985, there were seven large bingos of which five had prize payouts of $100,000. The Commissioners were concerned that a large bingo could drain charitable funds from a community and thus hurt other organizations in their fund raising activities. The Inquiry believes these large bingos are not beneficial to the community in general.

At least one $100,000 bingo was successful. Some others were reported to have been unsuccessful. One promoter said he would not recommend trying it again. Severe losses by charitable organizations could put them in a situation of having to raise further funds simply to pay off debts.

Therefore, it is recommended that:

4. Bingos with prize payouts over $3,000 be restricted and that if one is requested it be authorized by Order In Council only if it is of clear benefit to the community.

Discounting of Paper Prices

In recent months, large jackpots used as a marketing tool may have been replaced - or supplemented - by a paper price war. Discounting the selling price of the bingo paper has become commonplace. In current newspaper advertisements, halls compete as follows:

- "Tonight's special, two for the price of one on your $8 and $10 books"
- "all reg books $3.00"
- "buy a $8, $10, $12 book for only $4.95"
- "books $3, $6, $9, $12, buy one, get one free"
- "two books for the price of one"

When the marketing tool is either a high prize board or discounted paper, the net result is the same. In the largest halls, there may still be some return for the sponsor. In the medium size and small halls, however, there is little remaining for the sponsor and a marginal amount, it appears, for the hall operator.

The Commission sees a need to dissallow the discounting of paper for two reasons:

(a) only the large halls can survive paper price wars; and

(b) in the proposals for strict control of paper (in order to provide an audit trail) it will be essential to have fixed paper prices.

Under the proposed new gaming authority, sponsors will be required to submit, at the time of their application for a licence, a budget and a plan concerning the proposed bingos. The plan will include the proposed prices for bingo cards and the proposed prize lists. After approval by the gaming authority there will be a requirement that there be no price changes during the period of the licence without specific approval of the gaming authority.

The Inquiry, therefore, recommends that:

5. The discounting of bingo paper be disallowed.

The Commission recognizes the importance of free competition in the business world. Bingo, however, is not "business." It is permitted gambling, authorized with the intent that it will be a means for raising charitable funds. Prize wars or paper price wars fueled by affluent halls or affluent service clubs are not appropriate, particularly when they cut into revenues raised for charity and have a negative impact on traditional bingo operations.

In conclusion, the recommendations to restrict prizes to $3,000 per session, to eliminate accumulating jackpots and to disallow paper discounts will be beneficial to the game of bingo. It is true that some players and a small number of hall owners will be unhappy with the smaller payout and lack of jackpots, but in the long term these recommendations will serve to benefit charitable organizations.

CHAPTER FOUR

DEFINITION OF CHARITABLE OBJECT

Legal Definition

In the Lottery Licensing Provisions passed by Order in Council, November 1982 (O.C. 1921/82), a charitable object or purpose was defined as:

i. The relief of poverty
ii. education
iii. sports, recreation and cultural activities
iv. the advancement of religion; or
v. any other purpose of benefit to the community.

A charitable organization was defined as:

> ... an organization which has a charitable object or purpose and which operates without pecuniary gain to its members.

The above definitions are broad and they are interpreted liberally when the Licensing and Investigation Branch considers bingo licence applications, such that very few organizations are excluded. The words "charitable organization," "charitable object" and "charitable purpose," have grown to include generalities that do not coincide with the more specific definitions that the public expects for these words.

General Problems with the Definition

The opening of large commercial halls brought about significant changes in the type of organizations being licensed to sponsor bingos. It made bingo a viable fund raiser for many smaller organizations which did not have the premises or equipment necessary for holding a bingo. The success of commercial bingo as a fund raiser became well known and large numbers of organizations approached bingo hall operators requesting opportunities to become sponsors.

In addition, hall operators took the initiative and approached organizations to inquire if they would become bingo sponsors. Since the hall operators could only open halls for bingo if licensed sponsors were available, they, of necessity, had to find sponsors. The first halls to open used a large proportion of service clubs and more traditional "charitable" organizations. As the number of halls increased, operators sought out new organizations to become sponsors. An old-timers hockey club in Moose Jaw acknowledged that, while they had not previously considered themselves as a charitable organization eligible to sponsor bingos, they readily accepted the opportunity when approached by the hall operator.

During the hearings, it appeared that many halls had approximately one-third of their sponsors from service clubs, one-third from sporting groups and one-third from other community groups. Some halls, however, were staffed almost exclusively by sporting groups and organizations that were border-line in their qualification as "charitable."

Some operators told the Inquiry that they took into consideration the organization's need for funds when allocating events. Others used first-come or some other criteria. Some stated that licensing was the responsibility of Consumer Affairs and felt that as long as organizations had licences they should be considered eligible sponsors.

The hall operator's usual procedure was to allocate the events to the sponsor and then the sponsor would apply to Consumer Affairs for a licence. At the hearings commissioners asked whether or not there had been any occasions when potential sponsors were not granted a licence. The answer invariably was "no." Licences applied for were always granted. This fact was confirmed when questioning Department staff at the hearing:

> Our definition includes the phrase "for the general benefit of the community." If you apply that in rough terms, as long as it isn't individuals applying for a licence and as long as they have some place in the community they will be licensed. (Regina hearing, Tape 50:Side B).

Having issued licences, the Department did not make any follow-up to determine whether funds were being used for purposes which could be considered "charitable." The Department did not investigate to determine whether or not more funds were raised than appropriate according to the goals as specified on the application form.

Nor did the Department make any efforts to determine whether organizations were following the requirement in the licensing provisions concerning the handling of the funds. The licencee is required to "open and maintain a separate bank depository and accounting system for funds from bingo events, keep a record of all receipts and disbursements and retain any proceeds remaining after payment of expenses in that depository until they are used for the authorized charitable object or purpose."

Because the Department was willing to license any individual or organization which claimed to be a charity, and because there was no follow-up on the use of funds, it is not surprising that abuses developed. These abuses were brought to the attention of the Inquiry at every hearing throughout the province.

The loose definition of a charitable purpose was readily condemned by many of the Inquiry participants. The Mayor of La Ronge, Mel Hegland, talked to the Inquiry about:

> Organizations who operate for the sole purpose of providing members with jackets, beer money or paid tours. It is this type of organization that takes from the poor to feed the needs of a very select group of people, its members, and does not promote the welfare of the community as a whole. (La Ronge hearing, Tape 5:Side A)

At the same session, Marshal Leswick, representing the La Ronge Kinsmen Club stated:

> ...that he and his club were suspect of the so-called charitable organizations presently using the bingo hall facilities. Many seem to have sprung up overnight and we believe stretch the definition of charitable object

> to the limit. We are concerned with the rumored uses which some the organizations are putting their bingo profits to use such as houseboat parties, flying in lobster for dinner parties and purchasing club jackets for all family members. We question how these uses of bingo profits can be defined as charitable. (La Ronge hearing, Tape 7:Side A).

Adult Sports Groups

Ken Rauch, who appeared before the Inquiry on behalf of the Saskatoon Dodger Baseball Club, acknowledged that some clubs spent bingo proceeds in questionable ways. Rauch referred, in particular, to an oldtimers hockey club that had used its bingo proceeds to travel to Hawaii. Rauch drew a conclusion when questioned on this issue by a commissioner:

> Rauch: In my mind, most organizations that are involved in bingos are not spending their money charitably -- to the extent that there is supposed to be on charitable expenditures.
>
> Cuddington: You would go that far? You're saying it is not the occasional one that is spending it for other means?
>
> Rauch: In my opinion a hockey or a ball team that goes into a bingo place and has a bingo and uses that money for a windup. I'm not sure that that is charitable; that is personal ... I'm not familar with the technical wording of charitable but I personally feel it is not being adhered to. (Saskatoon hearing, Tape 44:Side B).

Others agreed and recommended changes to the existing legal provisions. In the opinion of the Inquiry, clubs spending charitable funds for team jackets, parties and other such self-serving projects should be refused licences. There is a need for a clearer definition of what is and what is not a charitable purpose, combined with an administrative structure that closely scrutinizes licences. Participants at the Inquiry particularly directed criticism at the licensing of adult sports groups. Under the existing terms and conditions these groups are entitled to raise money from bingo, but a number of people questioned whether or not the activities of adult sports clubs tend to be beneficial to the communities as a whole. The large sums of money raised by adult sports groups make this issue an important one.

The following four adult sports groups were selected to demonstrate the large sums of dollars that have and are being raised at bingo. It must be stated, however, that not all groups are as successful as those described below.

For the past two years, the Melville Millionaires Junior A Hockey Club has raised operating funds through bingo. In its submission to the Inquiry, the organization wrote:

> Before our organization began the bingo operations we were running a deficit of $50,000. This deficit had been increasing each year by $10,000 to $15,000. If it were not for bingo our hockey organization would have dissolved by now. (S-245)

The club has been successful in raising a considerable amount of money (as follows).

Melville Millionaires

	1984	1985 (6 months)
Number of bingo events	16	37
Net revenue from bingos (including one $100,000 bingo)	$ 7,689	$69,720
Net revenue from nevada tickets	6,300	$19,875
	$13,999	$89,595

The Saskatoon Thunderbirds Junior Men's Fastball Club provides an opportunity for fifteen to twenty young men under the age of twenty to play a high calibre of fastball. The money raised (see table below) goes towards purchasing new uniforms and equipment, to help cover travel costs and to help pay rent for an indoor ball facility that the Thunderbirds constructed and share with other clubs in Saskatoon. The manager of the team stated:

> We would have to admit that if we were not able to find ourselves working bingos, we would fold as we do not have any businesses that would write off the operating costs of a Junior Men's Softball Club. (S-194)

Saskatoon Thunderbirds

	1983	1984	1985 (6 months)
Number of bingo events	8	10	16
Net revenue from bingos	$4,607	$ 6,347	$ 3,633
Net revenue from nevada tickets	5,290	$ 6,650	$ 7,277
Total	$9,897	$12,997	$10,910

It should be noted that the Thunderbirds received nothing from Sask Sport and were successful in raising another $4,123 in 1985 from raffles, donations and team fees.

The Yorkton Slow Pitch and NAL Ballclub Affiliate is an umbrella organization for slow pitch clubs in the city of Yorkton, with a membership consisting of 756 registered players. Significant amounts of money were raised in 1984 and 1985 from bingo (see the table next page). These funds were used to construct a ball diamond complex at York Lake. Other funds have gone to the Heart Fund, the Day Care Centre and minor sports.

Larry Renton, the club president, wrote "Prior to bingos our diamond project was a dream and now it is a reality."(S-56)

Yorkton Slow Pitch and NAL Ball Club Affiliate

	1984	1985 (6 months)
Number of bingo events	73	49
Net revenue from bingos	$ 57,951	$ 58,140
Net revenue from nevada tickets	52,785	$ 51,549
	$110,736	$109,689

The Moose Jaw Senior Ladies Broomball League includes 100 members. The funds raised over the past two years have been used to cover ice fees and to pay for referees, equipment and other miscellaneous items.

Moose Jaw Senior Ladies Broomball League

	1984	1985 (6 months)
Number of bingo events	11	9
Net revenue from bingos	$ 6,899	$4,661
Net revenue from nevada tickets	6,367	$4,858
	$13,266	$9,519

It is not the intention of the Bingo Inquiry to criticize the individuals in these groups or their choice of a way to raise funds. The fact remains, however, that substantial amounts of money are raised from bingos -- money that might otherwise go to more traditional charities. While bingo has tended to assist adult sport clubs, the traditional charities have frequently suffered due to the growth of large scale bingos. Harold Kew, speaking on behalf of the Weyburn Bingo Committee, which is made up of the Sooline Historical Society, the Ukrainian Greek Catholic Church, the Independent Order of Odd Fellows, the Royal Canadian Legion and the Elks Club, informed the Bingo Inquiry that these groups all held bingos to raise funds for their charitable projects, but competition from the commercial halls with their large number of sponsors, their large jackpots and their large prize boards was cutting into the amounts of money raised by his clubs. He argued that the Weyburn Bingo Committee was therefore limited in its ability to continue to give back to the community. He ended his submission by raising questions:

> I would like to ask one or two questions that I think are very relevant to this Inquiry. Is it more important for a sports team to have new uniforms, and three of our organizations wear uniforms-we buy our own, or to buy a recliner for a bedside of a sick child so a mother can get a little rest? We put that recliner in the hospital. Is it better for a team

> to take bingo money for a trip to play many miles away or to provide a hospital with a cardiac machine that is used 2,400 times a year? We put that machine in the Union hospital. Is it more important to encourage a group to raise money with little effort or provide a glucose monitor to a diabetic? We put four in the Union hospital. Is it more important for a group to raise money for their own personal interest or to provide new and better treatment for eye disease? (Weyburn hearing, Tape 25:Side A).

Sports groups and other similar organizations compete for a limited number of charitable dollars; money used by these groups for registration fees, equipment and uniforms is lost to the community in general. Linda Slough spoke on behalf of the Saskatoon Goldfin Club, a swim club for young people:

> These are the ones (minor sports groups) we should be supporting, not the adults. The adults have the chance of making a go of it themselves. (Saskatoon hearing, Tape 36:Side A).

The Need to Redefine

Clearly there is a need to redefine a charitable group and a charitable objective or purpose. In fact, this clarification was requested of the Inquiry many times. Mr. Taylor, representative of the Saskatchewan Urban Municipalities Association, stated:

> One of the concerns that has come to us from particularly our smaller municipalities -- I say smaller as compared to Regina, Saskatoon or Moose Jaw -- is the proliferation of organizations that are running bingos or going into the bingo halls. We feel that there should be some clearer definitions within the act as to who qualifies as charitable or non-profit ... Now we're quite happy to have within our municipalities such organizations as the Lions Club, the Legions, and so on, who hold their bingos to raise funds for definite charitable or educational purposes. But what is becoming a concern in some of our communities is people just getting together, form a club, and then run bingos to raise funds to run their particular little operation which has no connotation whatever as a charitable organization. We think the Act needs tightening up as to who qualifies to run bingos under the present laws that we have. (Regina hearing, Tape 52:Side B).

The City of Prince Albert concurred with Taylor's remarks and proposed:

> That any charitable or religious organization requesting a bingo licence be required to submit with its application an indication of the charitable objectives or purposes for which the proceeds are to be used and that subject to approval being granted that the organizations be designated a Provincial Licence Number specifying the name and address of the charitable or religious organization and requiring subsequent verification by a statutory declaration of the purposes for which the proceeds were used. (S-145)

Recommendations

The Bingo Inquiry has concluded that the present definition is too broad and, therefore, recommends that:

6. A bingo licencee must:

a. be registered under The Non-profit Corporations Act as a charitable organization;

b. have been in existence as an organization one year prior to applying for a licence to hold a bingo; and

c. have a charitable object or purpose as listed below for:

   i) relief of poverty;

   ii) programs for the disadvantaged;

   iii) education that is beneficial to children, the disadvantaged or the community at large;

   iv) public facilities for sports, recreation and culture;

   v) the advancement of religion;

   vi) a purpose beneficial to the community and available to a significant portion of the community (rather than the limited self-use of the members); and

   vii) notwithstanding (vi) some limited benefits for minor sports (associations as opposed to individual teams).

7. The following specifically be excluded from gaining bingo licences:

   a) political parties;
   b) unions;
   c) adult sport and recreation organizations.

8. Proceeds from bingos be used within the province of Saskatchewan unless specifically authorized (i.e., licensing authority may grant permission to allocate funds to recognized charities outside of the province).

9. All organizations submit to the licensing authority with their application for a bingo licence, a detailed proposal and budget for the expenditure of bingo funds.

10. Funds raised from bingos not be returned to the licencee's general revenue but must be earmarked for specific projects.

If the first recommendation (above) is adopted, licencees will be required by law under The Non-profit Corporations Act to prepare and submit annual financial statements. The public may review statements and this may assist in making these organizations more accountable to the public. Finally, the recommendations that a detailed proposal and budget be submitted with the bingo licence application and that the proposed licensing authority will give close scrutiny to the applications, will help ensure that only projects consistent with the definition will be accepted.

The members of the Bingo Inquiry believe that the above recommendations will curtail many of the abuses that have occurred in the past years and also will assist efforts of the more traditional charitable groups in raising funds for the benefit of the whole community.

CHAPTER FIVE

LICENSING, INVESTIGATION AND ADMINISTRATION

The Effectiveness of the Bingo Licensing and Investigation Unit

The Criminal Code and the provincial Lottery Licensing Provisions set out who may run a bingo and how the funds may be spent. The administration of this program is the responsibility of the Licensing and Investigation Branch of the Department of Consumer and Commercial Affiars. Effective administration depends on:

1. specific terms and conditions that are realistic and enforceable;
2. the necessary financial and human resources to administer and police the terms and conditions that will govern bingo; and
3. the will to enforce the terms and conditions as established by government.

During the hearings the Department came under heavy criticism from the public for its failure to deal with problems that have developed in bingo halls across Saskatchewan. The Mayor of La Ronge, Mel Hegland, informed the Bingo Inquiry that the existing problems could be blamed on the Department. He said:

> I think that since the government did license these things (bingos) in the first place they have a responsibility to regulate them; and I believe the Department of Consumer and Commercial Affairs has fallen way behind on their responsibilities. (La Ronge hearing, Tape 5:Side A).

Elaine Hughston, part owner of the Regina Bingo Palace, was also criticial of the Department. She believed that many of the existing problems were because the Department lacked a clear and consistent policy. She told the Inquiry:

> It is our impression that there has been, in most submissions presented, an attempt to lay blame for the general condition of the bingo market at the door of the commercial hall operators. To this we would like to respond by saying that this business has been one very much of an experimental nature over the last three years. And since the Commercial and Consumer Affairs Department has generally been reluctant to give us any black and white rules to adhere to, there is obvious reason for the grey areas which surround the business. There have been policies on prizes, guidelines on rents, preferences of the department with regard to jumping jackpots and a good deal more vagary than you might imagine.
>
> We entered this business with the sincere desire to follow the rules, but soon became discouraged by the fact that a red light to us was often a green light to other operators. For instance, we were originally told in 1983 that the jumping jackpots were defintely illegal and not permitted in Saskatchewan. We did not begin using them until a competitor in

> Saskatoon defied the unwritten law and had such great success with no reproach from the authorities that we felt foolish not taking advantage of what was then a very successful promotion.
>
> In other words, if you take a business as big as bingo, allow anyone to open a hall, allow virtually anyone to get a licence, don't make any steadfast laws to control it, and rely on the businessman to regulate his own profit using only guidelines, suggestions and intimidation to control the business, it is really small wonder that the situation is not a lot worse. Like a child who has no discipline in the first three years, there are bound to be a lot of problems to sort out, and let us all share in the blame, but let us now work together to get some workable boundaries and put forward some constructive plans to get this business back on track for the general benefit of all those involved. (Regina hearing, Tape 52:Side A).

The police also criticized the Department. When Sergeant Gale Lindskog of the Regina City Police appeared before the Inquiry and was asked by the chairman whether the police received any assistance from the Licensing and Investigation Branch, he replied: "The assistance we receive from them is very small." (Regina hearing, Tape 50:Side A).

The Sergeant supported the above statement when he was asked if he knew of any investigation concerning unlicensed sponsors:

Lindskog: I found that one organization had run at least five unlicensed lotteries in one hall. A licence was issued to them, after the fact, by the Corporate and Consumer Affairs Department of the Government of Saskatchewan to apparently collect the provincial tax that was due to them. But this organization did run five unlicensed lotteries in that one hall. There have been other instances of groups running unlicensed lotteries also, but there have been no prosecutions against any of these groups.

Cuddington: To your knowledge, has there been any penalty of any kind?

Lindskog: No, absolutely not. The groups that ran these unlicensed lotteries are still running lotteries to this date, or bingos, within these halls.

Cuddington: So a report of an unlicensed event didn't result in suspension of privileges for a group?

Lindskog: No. It was reported to the Department of Consumer Affairs, and what they did with it, I have no knowledge. (Tape 50:Side A).

The Department's only recourse when irregularities occurred in a bingo hall was to withdraw the sponsor's licence. The Department took the position that this was too harsh a penalty. The commissioners disagree and consider that some of the offences which took place were serious enough in nature to justify at least temporary withdrawal of licences. A few such penalties would have established that the Department would not tolerate illegal activities at bingo halls.

Similarly, the commissioners believe it essential that there be at least random audits of sponsors' records to verify that bingo revenues have, in fact, been deposited to the credit of the sponsoring organization and the proceeds used for charitable purposes. Infractions should carry a penalty, and if no other penalty is available, then cancelling licences is essential.

The Department has not acted resolutely concerning expenses charged by the hall operator. The terms and conditions enacted in June 1984 required a fixed amount rental agreement but also decreed that expenses (presumably including the 2% levy) must not exceed 20% of the gross sales. It appears that little effort had been made to enforce this requirement. Late in 1985 the Department was still tolerating contracts providing 15% of gross plus $2 per player to the hall operator. This formula resulted in expenses well in excess of 20%. Some of the largest and most affluent halls were the worst offenders. They did not respond to the Department's efforts to reduce the expenses "by persuasion." Commissioners are of the opinion that arrangements of this nature should not have been allowed to continue past the end of 1984. Both the sponsors and hall owners should have been advised that such contracts were not acceptable and that licences would no longer be issued unless contracts were revised to keep expenses within the maximum allowable (20%).

In the returns being processed for the current fiscal year, bingos held in the largest hall in the province have expenses averaging 24%. This hall grossed $4.4 million in 1984/85. If the operator takes, as expenses, 4% more than the allowable amount, he has gained $176,000 for his own use which should have gone to the sponsoring charities. Commissioners consider that the Department has been neither effective nor consistent in attempting to deal with this issue.

The Commission felt that the enforcement of 20% limit on expenses and procedures required immediate action and conveyed this to the Minister on November 22 (see Appendix C).

Other criticisms of the Department from the public and from members of the Inquiry pertained to failure to enforce the requirement that the sponsor's name and licence number appear on all advertising, failure to establish adequate guidelines concerning trust accounts, and failure to make regular checks of bingo equipment.

Reasons for Administrative Problems

There are several reasons why the problems concerning the effectiveness of the Licensing and Investigation Branch have arisen:

a) the dramatic increase in licensed gaming in recent years;

b) the administrative structure of the Licensing and Investigation Branch;

c) lack of sufficient staff to administer licensing and to investigate; and

d) due to federal legislation, lack of regulations with appropriate penalties.

Bingo and Nevada Activity

	# of Licences		Gross Spending	
Year	Bingo	Nevada	Bingo	Nevada
1980/81	75		$ 1,999,424	$-------
1981/82	103		2,199,744	-------
1982/83	268	818*	4,599,167	65,011
1983/84	953	1,514	11,965,045	16,296,526
1984/85	1,906	2,569	30,365,588	33,819,169

(*In 1982/83 break-open tickets were first licensed.)

Gaming activities have grown rapidly in the province of Saskatchewan. By 1985 there were 32 major commercial and non-commercial bingo halls in the province. As is evident from the above statistics, in a period of just over five years, bingo and nevada ticket activity had increased dramatically. Simply keeping up with the day-to-day licensing of these events and the tallying of the returns had become a major task. However, during the five year period, staffing in Licensing and Investigation was increased but slightly. It was not until April 1985 that more staff were allocated to handle the increasing level of activity.

The Licensing and Investigation Branch has many administrative responsibilities in addition to lotteries. Among other activities, the branch is responsible for the enforcement of 20 pieces of legislation and handles all inquiries and activities relating to the issuing of licences. In 1982/83 Licensing and Investigation responded to 28,523 inquiries and complaints and issued 16,983 licences, of which 818, or 4.8%, involved gaming. In 1984/85 the branch received 32,554 inquiries and complaints and issued 21,882 licences, of which 5,192 or 15.9% pertained to gaming. (Department Annual Report

1984/85) Despite the rapid increase in gaming concerns, other mandated services retained priority within the Department.

Appearing before the Inquiry, the Director of the Licensing and Investigation Branch, O. A. MacGillivray, touched on what he considered to be the problems in regard to the control of bingo in Saskatchewan. He specifically referred to Bill C-81, an amendment to the Criminal Code, which he believes is vital to the future direction of gaming in the province of Saskatchewan. He stated:

> When the provinces have the ability to establish either legislation or regulations pursuant to Section 190 of the Criminal Code -- that have penalties and can provide certain conditions and certain penalties for violations -- it will certainly go a long way for the province to be able to take and establish a total policy on gaming and gambling within the province, and effectively be able to legislate its control ... (Tape 51:Side B).

He also viewed staffing as an important factor. When queried by a member of the Inquiry about the Branch's ability to deal with the problems relating to bingo, MacGillivray stated:

> We have been in a position of backlog for some time, and that's been compounded with the changeover to a computer system

> as of April 1st. We are presently at the point where we're a few months behind yet, but we are monitoring the financial reports and I think we're roughly three months behind now. We were quite a bit farther than that before. But we're monitoring those, and those that don't meet our internal guidelines, we're following up. I've had to assign staff from other areas. I have recently assigned another investigator from another area within the branch, and I've assigned two other clerks, and I'm stealing from other areas to provide the staff. We have been working on visits to all of the commercial operators and attempting to recap all of the financial reports, not just the bingos and lotteries, but all of the ones respecting casinos, raffles, etc. Our goal is by the end of the year to have those current. We will pull those and call for further investigation on those that don't meet our internal guidelines. So I wouldn't say we're doing nothing about it. We're doing as much as we can. Let's put it that way. (Tape 50:Side B).

Recommendations

Taking into account the issues discussed in the preceeding part of this chapter, the Commission recommends that:

11. A gaming authority be established responsible to a Minister of the Government of Saskatchewan to take over all responsibility for gaming from the Licensing and Investigation Branch of the Department of Consumer and Affairs.

12. Powers be granted to the gaming authority to administer all legislation relating to bingos, break-open tickets, casinos and raffles.

13. The authority be governed by a board of appointed representatives and be composed of two branches, the first responsible for licensing and the second responsible for investigation.
14. Funding for the gaming authority come from the 2% levy on prizes.
15. The gaming authority monitor the purchase of bingo paper from approved suppliers.

Discussion of Recommendations

The gaming authority will play the key role in regard to gaming in Saskatchewan. It will be the means by which the province's gaming policy will be administered and policed. Furthermore, the authority will act as an advisory body that will, by virtue of its expertise, be able to deal with any new issues that may arise in a field that is rapidly growing and frequently changing.

In 1984/85, the total prizes paid out from bingos, nevada tickets, raffles and casinos amounted to $55,000,000; a 2% levy would provide more than one million dollars. By using this funding mechanism, the operating expenses of the gaming authority will be covered. The gaming authority may wish to examine the existing fee structure and make recommendations to the government on changes which may be appropriate.

In order to create an audit trail, it will be essential to control the bingo paper. Licencees should be required to purchase bingo paper from an approved supplier (or suppliers) with duplicate invoices to the gaming authority and discounting of paper prices should not be allowed. In Manitoba all paper is distributed by the Lottery Foundation. Some other provinces are also recommending that the best control will result if the government itself is the distributor.

It is important that the head of the gaming authority have immediate access to a Minister of the Government. Gaming, and more specifically, bingo, is a multi-million dollar activity in Saskatchewan which will result in corruption if it is not closely regulated. As a form of legalized gambling, bingo is also an issue with a number of moral and social implications. Thus it is essential that the public perceives the management of gaming to be a priority with government. This can best be achieved through the creation of a gaming authority with direct access to the Minister.

Further Recommendations on Responsibilities of the Gaming Authority

It is recommended that:

16. The licensing branch of the proposed gaming authority:
    a. receive and review all applications for gaming licences to determine:
        (i) that the applicant qualifies as a charitable organization;
        (ii) that the proposals for use of the proceeds are appropriate;
        (iii) that the plan for income and expenses will result in an appropriate distribution of revenue among prizes, expenses and proceeds to charity;

    b. provide for an appeal process for those groups refused licences;

    c. act as a policy and planning body for the gaming authority that will recommend new policies in the gaming field to the government when necessary; and

    d. be the educational arm of the authority, providing information about gaming to players, sponsors, hall owners and the general public.

17. The investigation and auditing branch of the proposed gaming authority:

    a) investigate any irregularities that may arise in the field of gaming; and

    b) have the authority to audit any sponsor or any individual or group that has business dealings with sponsors or hall owners and audit and investigate any of the above mentioned activities when circumstances warrant it.

Discussion of the Above Recommendations

For the gaming authority to fulfill its duties it will need a highly trained, full time staff. The need for expertise is of the utmost importance. This is particularly applicable if the authority does not rely upon local police forces and the investigators are special constables on the authority staff. Sergeant Ron Robinson, gaming specialist with the Royal Canadian Mounted Police, told the Inquiry:

> ... the police, for example, the people on the vice squad throughout the country may only be on the vice squad for two or three years, and then for career considerations, may be boosted into another section on the drug squad, or on to commercial crime. We lose the expertise. (Regina hearing, Tape 50:Side A + B).

The Sergeant was of the opinion that these specialists could best be developed under the auspices of a gaming authority.

It may also be advisable to have legal expertise within the authority.

It will be useful for the gaming authority to have contact with other lottery commissions across Canada in both its developmental and operational phases. The problems that each provincial government faces are similar and the sharing of ideas and information will assist all provinces.

Revenue Distribution

One of the major issues that a gaming authority will have to address is revenue distribution. As indicated above, the failure to achieve revenue distribution targets was a basis for criticism of the Department of Consumer and Commercial Affairs at public hearings of the Inquiry.

There is at present a 60-20-20 guideline for revenue distribution: 60% to prizes, 20% to expenses and 20% to charities. While allocations to prizes and charities are general guidelines only, expenses are limited to 20% by an amendment to the Lottery Licensing Provisions (O.C. 755/84) in June 1984, which states:

> (6) In no event shall the expenses, other than prizes, associated with a bingo event held in a commercial hall exceed 20% of the gross revenue of the event.

As is evident below, over the past five years, there has been no adherence to the 60-20-20 guideline:

Revenue Distribution

Year	Prizes as % of Gross	Expenses as % of Gross	Charity as % of Gross
1980/81	50	23	27
1981/82	51	22	27
1982/83	56	19	25
1983/84	62	21	17
1984/85	65	22	13
1985/86-8 months	70.4	20.5	9.1

The percentages for expenses do not indicate a large discrepancy relative to the requirement that expenses not exceed 20%. But these are averages. In reviewing the percentages from individual halls, there was a large variation. Some were well under the 20%, and some were as high as 24-25% (see Appendix E).

The Department claims to have been using methods of persuasion to bring the offenders into line. In defence of this policy the Department notes it has succeeded in bringing expenses down from an average of 22% in 1984/85 to 20.5% in November 1985. It was apparent that some contracts had been revised to comply with the 20% rule. This policy has not, however, been effective in dealing with some of the largest halls where the expenses in the most recent statistics were still as high as 24%.

Hall owners deserve a fair return on their investments. The problem lies in the definition of a fair return. The present 20% formula may not be sufficient to cover costs in smaller halls. For the large halls, however, the 20% rule is providing excessive profit to the hall owner. In addition, the existence of the 20% ceiling has resulted in 20% becoming a flat rate or minimum charge which was obviously not the intention of the provision.

There has been discussion in Chapter Three concerning the problems in providing a reasonable percentage to the sponsor. Are percentage formulas workable? The Commission looked at various formulae including the possibility of an equal division between the sponsor and the hall owner after payment of prizes. Commissioners concluded that this would provide a fairer share to the charity than at the present, but it would still leave the large hall with an unfair competitive edge. The Commission concludes, as at least some submitters argued, that no formula would be workable in all situations.

Recommendations

The Commission recommends that:

18. The fixed limit of 20% for expenses be deleted from the licensing provisions; and

19. The gaming authority review all applications for licences to determine that the plan for income and expenses will result in an appropriate distribution of revenue among prizes, expenses and proceeds to charity.

The Commission has not compiled a detailed list of all of the items which should be incorporated into new legislation (e.g. requirements for adequate accounting records, limitations regarding payment of salaries and honoraria, restrictions as to who may work at bingos, duties of callers and checkers, etc., etc.). The Commission considers that many of the current regulations in Alberta and proposed regulations in British Columbia are appropriate and necessary.

Detailed legislation should be enacted which contains penalties for breaches of terms, conditions and regulations. A pamphlet in laymen's language would be a useful tool for members of sponsor organizations.

CHAPTER SIX

CONTROL OF BINGO OPERATIONS

The functioning of commercial bingo halls in Saskatchewan raises certain questions about the appropriate roles of sponsors and of hall operators. Who controls bingos and do the proceeds go to charity?

Legal Aspects

Lotteries and bingos are only permissable under the Criminal Code if (a) they are conducted and managed by a charitable organization and (b) the proceeds are used for charitable purposes.

The role of commercial bingo halls was clarified in the Lottery Licensing Amendment Provisions (O.C. 755/84 June 28, 1984) of the Province of Saskatchewan. The following sections should be noted in particular: 8.1(2)(a), 8.1(5)(a),(b), 8.1(6) and 8.1(7) and 8.1(8).

These provisions convey the clear intent that it must be the sponsor and not the hall operator who controls the bingo. A provision that the hall operator should not be paid any consulting fee with respect to the operation of the bingo implies that he should not be providing that service. A requirement of a "fixed amount rent," and a requirement that the commercial hall operator shall not share in any profits raised from bingo, place additional restrictions on payments to the operator.

A provision that the charitable organization shall "ensure that all advertising with respect to the bingo event bears the licence number" implies that the advertising will be done by the charitable organization, not by the hall owner.

A provision that the hall operator may provide supplies and operate a concession gives specific instructions as to proper involvement of the operator. Since bingos were to be conducted and managed by the charitable organization, it may be concluded that the Order in Council intended that specific permission was considered necessary to permit the hall operator even to run the concession and to stock and sell the paper.

Nowhere is there any authority for anyone other than the licencees to manage, conduct and control the bingo.

Problems with Control of Bingos by the Hall Operator

If a commercial hall operator were to control events in the hall, what would cause that operator to forget the ambition to increase private profit and why, in many instances, would such an operator be expected to act purely as the guardian of funds being raised for public purposes?

In general, anyone has the right to open and operate a business. This, however, does not apply to bingo. Bingo is gambling and as such is subject to the laws pertaining to gambling.

Nevertheless, as the Saskatchewan Commercial Bingo Inquiry began to suspect at an early stage in its deliberations, and had confirmed in the course of public hearings, the commercial operators in the province are in the position to control the bingo events in a hall from beginning to end and to otherwise dominate organizations in all dealings involving bingo. This is not to say that all operators choose to exercise such power. Some operators have attempted measures, at their own initiative and seemingly without profit in mind, to involve some or all of the hall sponsors in decision-making. Such instances, though, appear to be the exception rather than the rule, and it does not change the basic position of power that is potential for all hall operators. Furthermore, the actions of the Licensing and Investigation Branch, to date, appear ineffective in policing the licensing provisions that would influence hall control.

To begin to examine this issue, the Commission asked the following question in writing of current bingo sponsors: "Do you generally feel that you are allowed to run your bingo the way you want to? (i.e., controlling cash, controlling prizes, giving orders to workers)." Many sponsors, 24%, indicated they did not have such control and they described in what particular ways they lacked control. Certain other sponsors said, yes, their bingo was run the way they wanted, although these sponsors would rarely add further details.

When some of the sponsors who indicated they were satisfied with their freedom to manage bingos appeared on the stand at public hearings (generally to support the hall operator) they would admit that they did not control such things as event scheduling or the prizeboard or advertising. Sponsors sometimes did not wish to acquire a further level of control than at present. They were content to apply for a licence, sign contracts sent them by the hall operator and send members to the bingo hall who would work under the direction of an operator; their attitude was that supervision and decision-making like this should be "left to the experts."

Hall operators sometimes indicated to the Commission that sponsors did, in fact, collect the money and pay out the prizes as required by the licensing provisions. After questioning numerous witnesses, the Commission concluded that it could not accept the argument that handling cash during the bingo game constituted control of the event. The operator has been allowed to control the event through the selection of sponsors, the scheduling of events, the absence of negotiation in the setting of a contract, the setting of prize boards, the advertising and promoting, the control of bingo paper and the control of trust accounts. The sponsors did not make or share in the making of the major policy decisions. Furthermore, there appear to be many instances where operators have also supervised the flow of cash in the hall.

It was the hall operators who were in control. It was not the sponsor. In fact, sponsors would hesitate to offer suggestions or complain, since they were only there at the pleasure of the hall operator.

The hall operator did not provide these services without charge. He did, in fact, receive a share of the gross spending of the bingo which appears to be contrary to the provisions which state that the commercial operator shall not share in the profits.

Not only did he share in the profits, he took his share immediately after the prizes were paid and before any return was left with the sponsor. This fact in itself must indicate who was in control.

Given the current lottery licensing provisions and, more particularly, the lack of policing of these provisions, the problem of control of a hall potentially extends to larger non-commercial halls when used by more than one licencee. While there would be no commercial operator with a profit level contingent upon the control of the event, the organization (often a service club) that owns or leases the non-commercial hall might exercise an undue authority over the running of a bingo event by another organization. In this case, the holder of the bingo licence might not be in a position to ensure that all provisions under the licence are being followed since it does not properly control the event. Accountability might very well be lacking and the proceeds to be earned by the sponsoring charity might well be at risk.

As indicated earlier, the operator of a bingo hall is in a position to control bingo events from beginning to end. Not only is this control one that could potentially be exercised but, as a general rule, it actually is being exercised by the operator. Some examples follow although many others could be cited.

Gaining Access to Bingo Halls

The Ukranian Folk Dance Ensemble of Regina teaches dance mainly to young children and performs throughout Saskatchewan, Manitoba and Alberta. The group raises money through socials and other such events and relies mostly on parents to subsidize many of the expenses because of lack of opportunity to raise funds in other ways. The Ensemble has attempted to hold bingos at commercial halls in Regina but, over the past two years, has been unable to gain access (one bingo at a non-commercial hall was held).

The organization concluded there are certain larger clubs that have monopolized the halls. Frustrated with the situation, Pat Detz of the Ensemble said, "I also want to indicate that perhaps because of appearing at today's hearings we no doubt have closed any opportunity of securing any chance to be a sponsor at a commercial bingo hall." (Regina hearing,Tape 52:side B)

The Commission often found that hall operators had a backlog of applications by organizations that wished to hold bingos. There were no guidelines for the selection process. Sometimes operators claimed they picked the most worthy charitable groups; more often the operators said that, providing the applicants could get a licence (and this was rarely a problem), the sponsors who had the best workers, were most reliable and could entice friends, relatives and supporters as bingo players, received priority for bookings. Several situations existed where sponsors were not arms length from the hall operator. Sometimes, in fact, they were part owners.

This arbitrary approach to booking is a source of bitter frustration for some organizations who wonder why the operator has, for example, provided a booking to a senior sports club and has kept their own application (which they regard as infinitely more charitable) at the back of the lower drawer of the filing cabinet.

Event Allocation

In addition to being able to accept or deny the initial access of an organization to a hall, the operator normally allocates the dates upon which organizations will hold bingo. Some of these dates will be "good" events where the hall is accustomed to a large attendance and others are events where, depending upon promotions, the turnout will be poor. Some organizations complained that operators have "pet" clubs that receive the good bookings. The majority of events at Challenger Bingo in Regina were, for a long time, allotted to Molson's Fastball Club, an adult team. Organizations, too numerous to mention, have complained to the Commission that they have made little at bingos because they had been assigned unfavourable booking times.

Negotiation of Rent and Other Expenses

Prior to the bingo event, the sponsor is required to reach an agreement on rent and other expenses that will be charged by the operator, and to attach this contract to the licence application. Many sponsors were surprised when the term "negotiation" was raised in the course of public hearings; many sponsors regarded the determination of rent and other expenses as something that is set out in a standard contract. In any case, similar contracts tend to be used by many commercial operators in Saskatchewan and sponsors have little choice but to sign them rather than to enter into negotiations. Mr. Baldwin of the Central Regina Early Learning Centre typified the response to questioning of many sponsors when he said the "owner of the hall told us what the rental would be and that's hardly negotiations." (Regina hearing,Tape 57:Side A)

The Lottery Licensing Provisions state that expenses charged for any bingo event shall not exceed 20% of gross revenues. The Licensing and Investigation Branch, in the fall of 1985, cautioned certain licencees that because average expenses on a previous licence exceeded 20%, future licences might be witheld if the provisions were not adhered to. When questioned, sponsors seemed confused about what action they might take regarding their letters. It is not clear that such letters will succeed in lowering overall expense levels or in assisting organizations to have more say over the determination of rent and other expenses. There does not seem to be any existing practice of rent or other expense negotiation and, short of some action taken directly against the hall, the application of pressure upon certain sponsors is unlikely to propel them into a position of negotiating strength. Commissioners considered that the Department could have enforced the requirement by making clear to both the sponsor and the hall owners that licences would be withheld until a new contract was provided which would bring the expenses within the allowable 20%.

Control of Advertising

The Commission did not find any exception, among major bingo halls in Saskatchewan, where the design and placement of advertising was not controlled by the hall operator. Some operators consistently overlook the need to indicate the name and licence number of the sponsor. Sponsors did not appear to be aware of the licensing provision requiring them to ensure that the name and licence number appear in all ads.

Control of Prizes

The Commission did not find any commercial halls where a sponsor or a group of sponsors determined the prize board for bingo events. The operator has full control. In addition to having no say over the prizes paid to patrons during an individual bingo event, sponsors will normally contribute substantial sums up to $700 towards the coverage of accumulating jackpots. In 1984, the Licensing and Investigation Branch began to advise sponsors that trust fund signatories should be sponsors rather than the operator. In some halls, the effectiveness of this was negated by the use of pre-signed blank cheques. In many halls the hall operator is still in a position to exercise control over the disposition of trust funds. A problem also exists with special promotions where, again, the operator is in control and there is little or no accountability (for more information see Chapter Three).

Control of Paper

Hall operators, acting under the authority of licensing provisions, stock the bingo cards and sell them to the sponsors. Sponsors do not know the cost at which the hall operator has purchased paper from a supplier (the amount charged the sponsor tends to vary from 75¢ to $2.00 per player). Generally, there was no indication at public hearings that sponsors were ever advised on the method of number generation of the particular cards that were being used (the mathematical odds of a repeat card will affect the probability of a bingo within a limited number of calls).

Supervision During the Bingo Event

It was concerning the actual running of the event, the actual handling of cash and paper and the supervision of what happens on the floor, that many operators claimed was the indicator of who was in charge of the bingo event; and the operators said the sponsors were in charge. Yet, the Commission heard from many sponsors who disputed this assertion.

The Saskatoon Coffee Haven, a club for non-drinkers and non-drug users, held bingos in two commercial bingo halls. At one hall, the group alleged that the operator would cash personal cheques with someone selling books and, when workers were busy, would "show a handful of money that he put in the cash drawer" and retrieve his cheque. The group claims that "every time this happened bingo funds were short." At the second hall, the group says that after the first bingo the operator did the counting of cash and other calculations for them because it "saved time" and that they were "always short of cash." The group also claims that the owner made the following offer: "if our people couldn't do a good job he would supply us workers at $25.00 per person and someone to run front counter at $35.00 per person" (this offer is not permissable under the existing Lottery Licensing Provisions). (Saskatoon hearing, Tape 43:Side B)

The Regina Ringette Team described its experience at running bingos as "complete chaos" as a result of the actions of the hall manager. The group had only one person who had previous experience with bingos and were asked to appear at the hall at 5:30 for training; several of the members had to leave work early to drive from Davidson. No training was provided and the group sat ouside the manager's door until prior to the beginning of the first game. When one person went to post the bingo licence, she was told "don't be bothered with that." In spite of protests, the workers were not allowed to count the bingo paper prior to the arrival of the players. After the evening was over and the group was told it was in a loss position, the manager handed over $25 and told the workers to go out and buy a pizza. (Regina hearing, Tape 57:Side B)

Saskatoon Help the Handicapped held three bingos at a hall in Saskatoon and each time Peter Borus, head of the group, found his organization in a loss position and was unable to understand why this was happening. Borus claims that he was discouraged by the hall management from taking an active role in supervising the event. At a fourth bingo, so claims Borus, he insisted on assuming control and it was only at this bingo where a profit was made by the charity. (Saskatoon hearing, Tape 40:Side A)

Sometimes, as part of the activities of a sponsor, there are games which do not appear to be part of the licensed bingo event (often these are called "share the wealth" or "early players game"). These games represent another instance where control of the event by the sponsor is decayed. The Regina Riding and Driving Club, for example, held six sessions in a bingo hall where an early "series of six games" was held. Someone from the hall would come to the back where the workers were located and say "give me two of your best sellers to come out on the floor." The workers wore money aprons and sold bingo paper which came from the hall office. After the prizes were paid, the hall operators retrieved the aprons and remaining cash. The workers had no idea of how much money was involved. In response to workers' questions, the hall management said the games "had nothing to do with our bingo." (S-208) The Regina Ringette Club had similar experiences at the same hall.

The Early Players Game at a hall in Prince Albert and the Share the Wealth Game in North Battleford appeared to pose the same problems in terms of someone other than the sponsor being in control of the bingo operation.

Some organizations have claimed there were constraints on what they could say and how they could behave during the bingo game. Allegedly, operators would use their power to ban organizations from the hall or cancel future bookings if complaints were made or unwritten rules for behavior were not followed (this matter was of particular concern to the Inquiry - see Chapter

One). Mae Smith of the Regina Riding and Driving Club said there was an "undercurrent" of "intimidation" that was "never overt": "if you cause too much trouble or grumble too much we will not want to have you back." (S-208) The Kikinak Friendship Centre in La Ronge held some bingos in the local bingo palace, partly because it was unable to raise money successfully from bingos in their own hall due to the competition from the commercial hall. The executive of the Friendship Centre raised some concerns in the local newspaper about the distribution of revenue raised at the bingo hall. The operator promptly banned the organization from further participation unless a public apology were given (at our hearing the operator said he would reconsider his position). (La Ronge hearing, Tape 5B and 5/A)

As indicated earlier, operators generally claim that sponsors control bingo events but many organizations and the Commission disagree with this perception. One of the operators (the hall where he was involved closed prior to the finalization of this report) was Bob Ober of Regina. Ober seemed to dispute the abilities of many groups to manage bingo events: "They have a big problem trying to keep money straight and selling the books... some of them are quite apt to make mistakes." (Regina hearing, Tape 54:Side A)

Conclusions on the Control of Bingo Operations

The Commission re-affirms the importance of control by the licensed sponsor. Current practices at all levels of activity, from the initial attempt of the organization to gain access to a bingo hall up to the submission of the final financial report, must be reversed so that the sponsor has not only apparent but actual control. The achievement of this objective will be an important function of the gaming authority proposed in the previous chapter.

Sponsor Associations

To assist sponsoring organizations to manage events at bingo halls, to make arrangements for rent, to educate new groups and to equitably share bingo proceeds, other provinces have required or encouraged the formation of sponsor associations.

The Alberta Gaming Commission requires licencees to form associations at all new facilities that open for the purpose of bingos held on a regular basis. The associations have the following functions:

- arrange for facility leasing, procurement of supplies, salaried personnel and other items of common interest to member organizations;
- establish common bingo program, including prize-payout, rules-of-play, and house rules consistent with Terms and Conditions of Licence;
- schedule events and organizations to conduct them;
- maintain proper financial/inventory controls regarding services provided to member organizations.

In British Columbia, the Lotteries Branch is proposing changes to its licensing provisions that also allow for the formation of bingo associations with similar functions to those in Alberta.

In Saskatchewan, there have been some attempts by sponsors and by operators to encourage the formation of associations. The most significant example is the North Battleford Bingo Association connected with the North Battleford Bingo Palace. The Association sets dates for holding of bingos by different members, determines who will be member sponsors, and reserves policing powers over sponsors. It began in July of 1984, although the idea had been suggested by the manager the previous May. At the time of the Inquiry hearing (October 16, 1985), there were 68 members within the Association. David Shury, then President of the Association, said: "I don't think the sponsor can get a fair shake without an independent board speaking for it." (S-348)

While some of the sponsors appeared at our public hearings to support the work of the North Battleford Bingo Association, there were other sponsors who raised concerns. The Battlefords Wildlife Association alleged that several organizations were assigned the best evenings and that the Association "violated" its own rules. (S-147 and North Battleford hearing, Tape 14:Side A) The Cutknife Recreation Board said that when it came in to its first bingo it had not been supplied with regulations and did not know what its rights were. The Board claimed it was not aware how the Association Share the Wealth game could be legal in terms of the sponsor's licence, and it did not receive a satisfactory answer from the Association on this matter. While the organization agreed with the concept of bingo associations, it believed, "The association structure should reflect a fair and equitable access to all members and that proceeds should go to all properly qualified community groups." (S-336, North Battleford hearing, Tape 15:Side A) The North Battleford Boys and Girls Club "withdrew its sponsorship... and walked out" after its experience with four bingos where total proceeds going to the organization from bingo came to $105. Greg Rose, executive director of this organization, also indicated that the president of the association offered him a bingo event where the licence was in the name of another club. Rose was at a loss on how the report of this game could be submitted: "How am I going to explain this to the Government?" (North Battleford hearing, Tape 15:Side A)

The Northern Entertainment Centre, a commercial hall located in Meadow Lake, now has a group of six community organizations that have formed a pool. Eighteen bingos are held and then the total proceeds, after prizes and expenses are deducted, are divided equally among the six member organizations; in this way, none of the members have to suffer from a string of bad nights. Pat Lutz, president of the Meadow Lakers (a hockey team that is a member of the pool) claims to appreciate the role of the hall operator in running the affairs of the bingo hall. Lutz was not in favour of more government control. The person who lives 500 miles away "is going to have an awful hard time to convince them of anything." On the other hand, Lutz has "never had any trouble in getting in touch with the owner" and "he has total control and can say that's the way it's going to be." (Meadow Lake hearing, Tape 10:Side A)

Mr. Walls, one of the owner/operators of Swift Bingo in Swift Current says he would favour the formation of sponsors assocations and the holding of monthly meetings. Walls singles out event scheduling and says that operators of Swift Bingo would rather "have someone else make it rather than ourselves." (Swift Current hearing, Tape 30:Side A)

The Commission concludes that bingo associations can and should be a means for protecting the rights of sponsors in regard to hall control and in meeting regulatory requirements; problems, such as those suggested by the North Battleford experience, can be overcome, particularly if the development and operation of associations are monitored by the proposed gaming authority (see Chapter Five).

The Commission recommends that:

20. Bingo associations be mandatory in all halls used primarily for bingo (four or more events per week).

21. All sponsors must be a member of a bingo association where such associations are mandatory. Members will elect a board of directors and executive committee and may hire (if necessary) a bingo manager.

22. The responsibilities of a bingo association will include:

    - handling all dealings with hall owner (including rent negotiations);
    - scheduling of bingo events;
    - purchasing of paper;
    - renting, leasing or purchasing of bingo equipment;
    - advertising;
    - setting the bingo program (prizes);
    - determining eligibility for membership (see below);
    - running the concession when it is not run by the hall owner.

23. The bingo manager cannot be a member of the board of directors. Remuneration will be on a straight salary basis rather than a share of proceeds and the association may wish to consider bonding the manager.

24. The manager's duties will include the day-to-day running of the bingo hall under direction of the bingo association, including the hiring of callers

(the association may also wish to consider bonding the callers).

25. Associations are encouraged to negotiate a flat rate monthly rent, with a provision that an adjustment may be made if additional bingos are scheduled (to cover increased variable costs). There will be no payments to hall owners on the basis of a percentage of gross spending.

26. Associations will be required, prior to operating, to present their budgets for income and expenses to the proposed licensing authority for approval. The authority will review these plans in light of market conditions.

27. The association will submit a plan to the licensing authority, prior to operating, regarding the number of organizations that will form the membership, the principles for entry and exit of association members, and the participation (voting) of members within the association.

28. The above plan shall be based upon equity among members, efficiency of raising funds for specific charitable purposes, and the principle of allowing fair access to charities within the community to bingo as a means of raising funds.

29. The licensing authority shall receive reports on all exit and entry of member organizations of the bingo association and other information pertaining to the monitoring and policing of association membership.

30. Notwithstanding the existence of the association, individual organizations will make application for licences (there will be no umbrella licensing).

CHAPTER SEVEN

THE ROLE OF LOCAL GOVERNMENT

Bingo has become an issue for cities, towns, villages and rural municipalities. Local governments in Saskatchewan have played a role in licensing of bingos where the prize value of a session is less than $1000 and in dealing with the service needs of bingo hall operators and of those affected by bingo halls within the community. Written submissions and presentations at public hearings raised issues concerning the future roles of the local governments.

The Right to Restrict Bingo Halls

At La Ronge the Inquiry heard about the negotiations between the town and the Banach partners who had applied for a business licence to open a commercial bingo hall. The town council refused to issue a business licence, presumably because it felt it was not in the best interests of the town. Community organizations were already conducting small fund-raising bingos and a service club sponsored a larger bingo occasionally.

The Banachs, apparently on the advice of their lawyer, opened the La Ronge Bingo Castle in March 1985. The town charged the owners and the case was heard by the Court of Queen's Bench. The court upheld the town's right to refuse to license a bingo hall provided that the reasons for so doing did not show lack of good faith or discrimination. (La Ronge hearing, Tape 5:Side A)

A somewhat similar case had occurred in Prince Albert in 1984. The city already had a large bingo hall operated jointly by two service clubs, the Kinsmen and the Elks. Subsequently, three Lions Clubs sought a business licence to operate a bingo hall. The application was refused by City Council and a court case resulted in an order that the clubs be granted a licence. It was ruled that "the Urban Municipality Act did not include a general authority to limit the numbers of particular kinds of businesses."

The La Ronge Bingo Castle was closed following the judgment in August 1985. In October a referendum was held in connection with the civic elections in which the majority of voters expressed their interest in having a commercial bingo hall in La Ronge. It is our understanding that the town granted two licences in November for commercial bingo halls, the second one involving the Lac La Ronge Indian Band.

In Prince Albert, the three Lions Clubs did not open a hall. However, they became active sponsors in PA Bingo, a commercial hall which opened in July 1984. The commissioners conclude, from these cases, that local governments have the power to refuse to license bingo halls. However, having decided to license bingo halls, it appears that they have no authority to limit the number of licences.

Location of Halls as it Relates to Parking

In Yorkton, a group of residents living adjacent to a bingo hall (PK Bingo) complained bitterly about the noise in their neighbourhood after bingos which continue until early morning. Some of the parking is on a lot where a house has been removed and is therefore part of a residential area. The hall operator who owns this vacant lot claims that he cannot be restricted as to its use. The residents had taken their complaints to city council but nothing had been resolved. (S-109, S. Boyd and Delores Holstein, Clarke Ave. Residents, Yorkton hearing, Tape 22:Side A)

A somewhat different complaint was heard at the Regina hearing from tenants of the Centennial Mall. They told the Inquiry that bingo players occupied much of the mall parking lot. Other businesses might have to close because the lack of parking has had a disastrous effect on their numbers of customers. They claimed that the bingo hall was originally intended for evening operation only and that the decision to operate every afternoon had adversely affected the other businesses. They told the Inquiry that complaints to the building owner and to city council had not resulted in any resolution to their problem. (S-448, Shug Kubota, Regina hearing, Tape 49:Side A and S-464, Ron Mercier and Ben Hugniuk, Centennial Mall Merchants, Regina hearing, Tape 52:Side A)

The Inquiry acknowledges the seriousness of their concerns but considers that local governments have the authority through zoning bylaws to restrict the location of halls and to specify parking requirements.

Sunday Bingo

Initially the Department had a policy of not issuing bingo licences for Sundays. This was changed in the late 70's to a situation where licences would be issued for Sunday except where the local government had passed a bylaw prohibiting bingos on Sunday. In early 1985 the Department began issuing licences for Sundays irrespective of local bylaws. This resulted in strong complaints, particularly from the City of Saskatoon. The Department appears to have reconsidered and is now attempting not to license on Sundays in contravention of the wishes of the local governments.

Hours of Operation

The submission from the City of Regina noted that "the City's authority to regulate operating hours of bingo halls under provisions of the the Urban Municipalities Act is not clear. It would therefore be desirable to reinforce our authority to place such regulations on bingo hall operations through specific delegated authority under the Lottery Licensing Provisions." (S-452)

Licensing of Small Bingos

Current lottery licensing legislation provides that local governments may license bingos held once per week or less where the prizes do not exceed $1,000 per event.

Some concerns have been expressed to the Inquiry that municipal officials may not be cognizant of all aspects of bingos and lotteries and that local politics may be a negative factor. There are sound arguments in favour of having all licensing done by a provincial body (see Chapter Five).

Other Concerns of Local Governments

The Inquiry received numerous submissions from cities, towns and villages. A submission was also received from S.U.M.A. In addition to the above-mentioned licensing problems, they expressed concerns about the need for regulations to ensure that hall operators do not take too large a share of the proceeds and that the sponsoring charities get a fair share. They were concerned about the impact of commercial bingos on other community fund raising organizations. They were concerned that some sponsors were using proceeds for purposes which would not qualify as "charitable." They were concerned about the social impact on the poor.

One small town in northern Saskatchewan (St. Walburg) which is within an hour's drive of three communities that have commercial bingo halls expressed a serious concern about the outflow of cash from their community (see Chapter Two).

Discussion

A bingo hall is not just another business. It is licensed gambling. It may therefore be necessary for local governments to consider proposals for bingo halls in a special way as opposed to simply licensing a business.

Recommendations

The Inquiry recommends that:

31. All bingos, irrespective of frequency and prize limits, be licensed and regulated by a provincial licensing authority.

32. No bingo licences be issued for Sunday with the exception of halls where bingos are held infrequently (no more than two bingos per week).

33. Hours of bingo be limited from 12 noon to 12 midnight (bingo sessions must begin and end during this period).

34. The licensing authority shall honor the wishes of local governments which pass by-laws to further limit the hours or days of operation.

CHAPTER EIGHT

NEVADA TICKETS

Background

Break-open tickets, also referred to as pull-tickets or nevada tickets, have escalated in popularity since they were legalized in Saskatchewan in late 1982.

Nevada Tickets

Year	Licences Issued	Gross Spending
1982/83	818	$ 65,011
1983/84	1,514	$16,296,525
1984/85	2,569	$33,819,169

Licences to sell break-opens are granted to clubs and non-profit organizations to be sold on their own premises to their own members. Licences are also granted for sale at bingo halls. In addition, since 1984, licences have been granted for the sale of break-opens in hotels with the proceeds going to the University Hospital in Saskatoon and the Science Centre in Regina.

No statistics are available for the gross spending on break-open tickets in bingo halls. It is known, however, that at virtually every bingo session break-open tickets are sold. The bingo sponsor obtains two licences, one for bingo and one for break-opens.

Arguments in Favour of Nevada Sales in Bingo Halls

At the hearings and in the submissions presented to the Inquiry, the majority of bingo players and sponsors stated that they wished to see break-open sales continued in the bingo halls. Reasons for this popularity vary. The tickets induce an atmosphere of excitement. Some players would cease to play bingo if nevada tickets were not available. For the sponsor the nevada tickets are an easy way of raising funds. A review of submissions bears this out; in fact, in many cases, revenues from bingos were non-existent whereas funds raised from nevada tickets were substantial.

The following is the experience of Saskatoon Foster Care Association which has used bingos as a means of fund raising for several years:

Saskatoon Foster Care Association

Year	Number of Events	Net Revenues From Bingo	From Nevada Tickets
1983	3	$2,056	$2,326
1984	8	4,121	4,625
1985	8	(22)	3,024

In 1985 bingo revenue for this Association dropped considerably, to the point where the organization incurred a net loss from bingo. The Foster Care Association is not the exception to the rule. The Regina Telephone Pioneers, an organization providing services to the handicapped, faces a similar situation and concluded that the sale of nevada tickets is crucial to its ability to raise funds. Lynn Lowe, the organization's contact person, responded to the Inquiry's questionnaire, and in particular to a question of whether or not break-open tickets should be sold in bingo halls. He wrote: "Definitely, if we didn't sell Nevadas, we would lose money or make little or nothing." The results of the Telephone Pioneer's March bingo in 1985 support this statement. Net bingo earnings totalled $358; the sale of nevada tickets brought the club $680 (S-260). The YMCA Laser Swim

Club of Saskatoon would agree with the desirability of continuing to sell nevada tickets. The Swim Club answered the same question posed above by stating "yes--frequently this is the only money made." (S-19)

YMCA Laser Swim Club

Year	Net Revenues from Bingo	Net Revenues from Nevada Tickets
June 20/85	($99)	($75)
July 26/85	(64)	1,057
August 16/85	(53)	899
September 16/85	127	(372)
October 9/85	(113)	844

It must be acknowledged, however, that sponsors were not asked whether they would still favor nevadas if they could be assured of a reasonable return from the bingo itself.

Nevada and Bingo Revenues - Problems

The existence of the ready income from nevadas has contributed significantly to the current problems related to the distribution of bingo revenues. As competition among halls has increased, operators who control the halls have raised prizes and often decreased the price of paper (bingo cards) in order to attract more players. The result has been that a much higher percentage of the gross sales is being paid out in prizes. For the most part, the hall operator has continued to receive a fair share but there has been little left for the sponsor. In many cases the sponsors have had to use part of their nevada profits to offset losses from bingo.

All of this was beyond the control of the sponsor. The hall operator determined the program, the advertising and the prizes. He also determined the selling price for the paper. More important, he is the one who determined which sponsors would have the privilege of conducting bingos in his hall. Therefore a sponsor was reluctant to complain to the operator even if the bingo proceeds were small. As long as the nevadas were profitable, the sponsor accepted the small bingo returns and sometimes even losses on the bingo. In effect, sponsors have provided free labor to staff the bingo halls. The hall operator has profited much more from the bingo than has the sponsoring charity. The sponsor has been willing to continue to provide this free labor for the hall operator only because of the profits being made from the nevadas. Hence, if there had been no nevada sales in bingo halls, the hall operator would have been forced to provide a reasonable return for the sponsor or he would have been out of business.

Nevadas and the Bingo Player

Other factors related to nevadas were seriously considered by the members of the Inquiry. Purchasing of nevada tickets and bingo tickets is a choice of the individual. Freedom to select, when this selection does not cause harm to other individuals, was considered to be very important and it is recognized that some people will no longer play bingo if nevada tickets are not available.

Nonetheless, the sale of nevada tickets in bingo halls is one of two factors which have changed bingo halls from places of entertainment to places of gambling (the other factor is high prizes including the accumulating jackpots).

Furthermore, would the banning of break-open tickets in bingo halls strike a blow to the purely personal freedom of the casual gambler? Bingo was once a form of entertainment for the player. Nevadas add a serious level of gambling which did not previously exist in the halls which carries with it euphoria and addictiveness. The amount that can be spent has no limit. The result is that a charitable organization raising funds for a worthy cause may be indirectly encouraging someone to spend large sums of money on nevadas. One submission stated "the sales of the Nevada tickets should be banned. They are a problem to the less fortunate" (S-19). Harry Walker, a North Battleford lawyer, commented on the sale of nevadas:

> The logistics of handling twelve or fourteen bingo cards at one time effectively limits the amount which a patron can spend on the bingo game itself. However, the same concept does not apply to the purchase of Nevada tickets and, as a result, it is not uncommon to observe persons spending significant sums of money, not just until they win, but, until all of their money is gone. (S-502)

The Inquiry Chairman, when he spent an evening playing bingo, was amazed at the adeptness of players who would dab their bingo cards with one hand while using the other hand to open nevadas.

Members of the Inquiry were told stories of individuals spending hundreds of dollars a night on nevada tickets. While many players do not purchase nevadas, it was estimated that on average $15 - $50 per person was spent on nevada tickets a night.

The Problem of Accountability

Finally, there is little audit control over the sale of break-open tickets, thus allowing for the possibility of slippage. Ken Rauch of the Saskatoon Pioneer Baseball Club told the Inquiry that "within our own organization we've had internal control problems with nevada tickets on a couple of occasions. We've since taken steps to correct this" (Saskatoon hearing, Tape 44:Side B). This raises a serious question about whether funds raised from nevada tickets for charitable purposes could be going elsewhere. It is not possible to be certain of what is happening to the money raised from the sale of nevada tickets when groups remove unsold tickets from the halls or when partial boxes remain unsold. At the Regina hearings it was put to Sergeant Robinson that nevada tickets were uncontrollable and that amounts reported were often at the discretion of the group holding the event. He replied:

> I believe it is. Specifically here in the province of Saskatchewan, and in other provinces, other than Manitoba and Alberta -- and even there they have problems with Nevada tickets. The province of Manitoba for example, the legalized figures we have for Nevada tickets in 1983 -- no, 1984 -- was $87 million. Now, what approximately would it be here? Thirty-three million dollars. The province of Manitoba has a million people. The province of Saskatchewan has almost a million. You can figure out the difference between 87 and 33 yourself. Either it's not being reported here, or it's not being controlled in a manner it should be.
>
> The criminal activities in break-open tickets is almost unbound and very difficult to control from a police perspective and a government perspective. Slot machines would be easier to control than Nevada break-open tickets. (Regina hearing, Tape 50:Side A)

Conclusions and Recommendations

This issue was a concern to members of the Inquiry and resulted in serious deliberation. It is sincerely believed that the outlawing of nevada tickets will have a positive effect on bingo. The game will once again become more of a social event; the amount being spent will be limited by the purchasing of only bingo cards. Sponsors will have one less responsibility, thus making it easier for them to run and control the bingos, and the opportunity to mishandle funds will be restricted. Therefore, it is recommended that:

35. The sale of break-open (nevada) tickets be banned in all bingo halls.

36. The proposed gaming authority monitor the bingos closely to see that the sponsors are getting sufficient revenues and, if this is not the case, the gaming authority may consider raising the cap placed on the prize board to allow reasonable revenues for the charitable organization.

Discussion of the Recommendations

It is recognized that with the elimination of nevadas, there will need to be an adjustment in the distribution of bingo revenue in order to provide a reasonable return for the sponsors. This will be accomplished by (a) reduction of the portion of gross sales paid out in prizes and (b) reduction of amounts being paid to hall owners (their payments will be for rent only).

This recommendation is not inconsistent with what is happening in some other provinces. In British Columbia, nevada tickets are not sold in bingo halls. In Alberta, pull tickets are not sold in bingo halls except that "a community league who operates a bingo once per week in their own hall would be eligible for a pull-ticket licence."

In Saskatchewan opportunities to purchase "instant lotteries" are available at lottery ticket centres throughout the province. The centres now sell six different products, including the "instant lotteries" which are similar to a break-open ticket. In addition, nevadas are sold by clubs on their own premises and also at hotels to the public.

It should be noted that during 1984-85, 49 million dollars were spent on lottery tickets at Lottery Ticket Centres. Net proceeds of 8 million dollars went for the support of sport, culture and recreation through the administration of Saskatchewan Trust.

Money which flows through Lottery Ticket Centres is subject to extremely tight control and it has been possible to eliminate slippage of funds almost entirely. This is in sharp contrast to the present situation respecting revenue from break-opens in bingo halls where it is suspected that the slippage of funds is substantial. The Inquiry believes that break-opens should be subject to close controls and that this would be difficult to accomplish in bingo halls.

CHAPTER NINE

THE MANDATE AND THE FUTURE

The terms of reference, as set out in SCHEDULE A of Order in Council 596/85 of May 29, 1985, guided the Saskatchewan Commercial Bingo Inquiry in understanding its task as well as serving as a checklist of the Commission's progress.

Essentially, the Commission considered the terms of reference as the Government of Saskatchewan's intentions concerning a public inquiry. The terms provided a mandate for the Inquiry. The first step was to gain a full understanding of the meaning of these terms (see Chapter One). Following this, the Commission proceeded, independently of the Government, to undertake research, to consult the opinion of concerned parties through written briefs and public hearings, to reach conclusions, to make recommendations and, finally, to prepare this report.

This chapter indicates the extent to which the Commission has addressed individual terms of reference. The chapter concludes with a crystal ball gaze at what the future may be like for the game of bingo if the policy direction recommended by the Commission is adopted.

The Opening Paragraph

The opening paragraph of the terms of reference allowed the Commission to exercise discretion in defining its subject area, choosing the tools it would use, and accepting evidence from the public:

> The Commission of Inquiry shall have responsibility to inquire into the role of commercial bingos in the Province of Saskatchewan by undertaking a study and evaluation thereof and, without limiting the generality of the foregoing, to inquire into, evaluate, study and report...

The terms of reference (a) to (i) set out the Commission's task without "limiting the generality" of the opening statement which dealt with an inquiry into "the role of commercial bingos."

While the opening paragraph referred only to commercial bingos (and the Department of Consumer and Commercial Affairs considered there to be 23 such establishments in the province during the main period of the Inquiry), the Commission perceived its mandate as more broad than just examining 23 hall operations. It was clear from the subsequent terms of reference that the role and activities of all bingo halls, including non-commercial, along with the roles of all licensed charitable organizations, were proper subjects of the Inquiry and the potential objects of recommendations.

Terms of Reference (a) to (i)

What follows is a brief discussion of terms of reference (a) to (i), where the Commission was asked to "inquire into, evaluate, study and report."

> (a) The administration, allocation and distribution in Saskatchewan of bingo revenues including:
>
> (i) the percentage distribution of gross revenues between expenses, prizes and charities at bingos conducted in commercial halls as opposed to non-commercial halls;
>
> (ii) the revenue earned per event by charities in commercial halls as opposed to non-commercial halls;

Chapter Five of this report addresses the distribution of gross revenues at both commercial and non-commercial halls. Essentially, the Inquiry was of the opinion that it was not practical to introduce a strict adherence to a fixed percentage distribution of gross revenue among expenses, prizes and charities. Evidence at the public hearings indicated there were many problems with adherence to the current 60-20-20 percentile distribution guidelines of the Government. In a situation where a prize board is wholly or partially fixed and gross revenue is variable, there will continue to be problems in meeting guidelines or regulations. The Commission has recommended that there be a requirement for the rent for the premise to be regulated at a fixed amount per month. Furthermore, the Commission has introduced recommendations that would ensure that a sponsoring charity, through its membership in an association, would have much enhanced power to negotiate rent and to control the running of the bingo (Chapter Six). A gaming authority would closely monitor the distribution of bingo revenues on a hall by hall basis to ensure that reasonable net proceeds would go to charity (Chapter Five). In addition, adoption of recommendations concerning the reduction of the prize limit per bingo session to $3000, the elimination of accumulating jackpots and the disallowing of paper discounts(Chapter Three), would mean an increase in revenues available to charities.

The Commission examined the percentage distribution of gross revenues as supplied by individual sponsors and by individual halls. This data assisted the Commission in understanding the current situation and in coming to conclusions. Provincial historical tables for a.(i) and a.(ii) were prepared based on data supplied by the Licensing and Investigation Branch of Consumer and Commercial Affairs; these appear in Appendix D.

a.(iii) the prize structure of bingo operations in the Province of Saskatchewan.

The Commission carefully examined submissions and cross-examined witnesses concerning the prize structure at bingo halls across the province. Many cases were noted of prize competition that was detrimental to the sponsoring charities, where sponsors had no say over the prize structure, and where accountability was lacking for the funds that were accumulated for jackpots. A discussion of Commission findings appears in Chapter Three.

a.(iv) the feasibility of developing prize limits

The Commission was of the opinion that it was not only feasible but, moreover, essential to implement prize limits (see Chapter Three). The Commission recommends a prize limit of $3000 per session. Another recommendation calls for the elimination of the sale of break-open tickets in bingo halls but adds the provision that, if gross revenues from bingo nights are insufficient to leave sponsoring charities with a satisfactory return, the prize limit could, over time, be adjusted upward on the recommendation of the gaming authority (see Chapter Eight).

(b) The provincial bingo licensing unit within Saskatchewan Consumer and Commercial Affairs including:
  (i) the scope of activities, jurisdiction and functions;
  (ii) its effectiveness; and
  (iii) the adequacy of the regulations and procedures it utilizes for licensing the conduct and management of bingos in the province as compared with the policies and practices in other Canadian jurisdictions.

Through an examination of files, a written submission from the licensing unit, an appearance in Regina of the Registrar of the unit, discussions and review of material from other provinces, the Commission gained an understanding of the activities, jurisdiction and functions of the provincial bingo licensing unit (there are references to this throughout the report). Various witnesses commented on incidents where the unit could have been more effective. The Commission was concerned about the extent to which bingo appears to have gone out of control in the province. Views were presented that applications for bingo licenses were not subject to close scrutiny, that revenue distribution guidelines were not being followed, that the flow of money within bingo halls was not being closely monitored, that there was little or no follow-up to ensure funds raised through bingo went to charitable purposes, etc. In response, the licensing unit indicated it hoped to improve its efficiency through a computerized licensing system and that it had been constrained in its investigatory abilities due to budget limitations (see Chapter Five).

The Commission recommends that authority for the licensing and investigation of bingos (along with break-open tickets, raffles and casinos) be placed with a newly-created gaming authority (see Chapter Five). The authority would be developed and managed by a body that devotes its entire expertise to the subject of gaming management in the province. Additional regulations and procedures that could be used by the gaming authority, and that would be an advancement upon current licensing and investigation practices, are listed throughout this report.

(c) The role and activities of commercial bingo hall operations.

A representative from every commercial bingo hall in Saskatchewan appeared at a public hearing and most halls presented detailed written information prior to hearings. The Commission gained a thorough understanding of "the role and activities of commercial bingo hall operations" (for conclusions and recommendations arising from this process see all prior chapters of this report). If the Commission's recommendations are adopted, commercial bingo halls may continue to exist but they would be nothing like current halls where the operator/owner has the upper hand in control and revenue distribution. Individual organizations and hall associations would exercise control, and the activities prior to, during, and after the bingo event would be monitored closely by a provincial gaming authority. Furthermore, one of the major current activities within bingo halls, the sale of break-open tickets, would be banned if the recommendations of the Commission are adopted.

(d) The role and activities of licensed charitable organizations conducting bingos in commercial bingo halls.

(e) The role and activities of licensed charitable organizations conducting bingos in non-commercial halls (community bingos).

Through advertising and letters sent to holders of bingo licenses, the Commission invited a large response from charitable organizations in the form of written submissions and appearances at public hearings (see Chapter One). The roles and activities of these organizations were discussed and examined in depth. The Commission was concerned that some of the purposes to which funds raised at bingos were not, within reason, truly charitable and the Commission concluded that the definition of a charitable purpose should be tightened (see Chapter Four). The recommendations regarding the formation of a bingo association for every major hall (see Chapter Six) and the proposed banning of break-open tickets in bingo halls (Chapter Eight), and other regulatory changes that are proposed (see especially Chapters Three, Four and Five) would modify the role and activities of charitable organizations holding bingos.

From the perspective of the individual charitable organization, there would be little or no difference in the experience of holding a bingo at a commercial hall as compared with a non-commercial hall, if the Commission's recommendations are adopted.

(f) The impact on and inter-relationship between commercial and non-commercial bingo operations.

In some instances, the Commission found little to distinguish between the method of operation of a large non-commercial hall and a commercial hall except, ultimately, for the disposition of profit gained from rental or the sale of goods (i.e. paper) and services (i.e. caller, concession). More often, however, the evidence pointed to the inability of smaller, traditional non-commercial bingo operations remaining competitive because of the arrival in the community of a commercial bingo palace (see Chapter Two). If the Commission's recommendations are adopted, non-commercial bingos will once again be in a much improved position to operate successfully, due mainly to prize limits (see Chapter Three).

(g) The feasibility of a public interest procedure for allocating bingo event opportunities in commercial halls.

Very few participants to the Inquiry commented on the feasibility of such a public interest procedure, although several witnesses believed it would be difficult for bingo events to be allocated by a central authority located, say, in Regina when an event occurs hundreds of kilometres away. Numerous organizations did, however, comment on the difficulty they have had in getting access to good bingo nights or in getting initial access to commercial bingo halls (see Chapter Six). The Commission recommends that the allocation of events be one of the major functions of bingo associations that would be formed for every major hall. Associations would also develop policies on the entrance and exit of active members and these policies would be reviewed by the proposed gaming authority; in this way there would be some reassurance that charities in need of revenue within the community would have a fair chance of raising funds through gaining access to bingo halls (see Chapter Six).

(h) The need for a specific licensing and regulatory program for commercial halls within the Province of Saskatchewan and, more specifically, the following:
  (i) the location of halls within the community;
  (ii) the need for some restriction on the number and size of commercial halls within communities;

(iii) the need to restrict commercial halls from communities below a specific size due to the potential impact on charities using non-commercial halls.

The Commission did not, on the basis of evidence presented and its own deliberations, conclude that there was a need for a "specific licensing and regulatory program for commercial halls." If recommendations in this report are adopted, particularly on new licensing provisions and on a gaming authority (Chapter Five) as well as on prize limits that could serve to limit the scale of bingo operations (Chapter Three), many of the concerns implicit in this term of reference would be resolved.

The Commission was of the opinion that local governments already have the authority to exercise some control over the basic existence of large-scale bingo halls within the community, and over their location, and on other matters of concern (see Chapter Seven).

The concern about the impact of commercial bingos upon charities using non-commercial halls (h.iii) is addressed in Chapter Two and, as indicated above, should be resolved if the Commission's recommendations are adopted. The Commission was of the opinion that a separate licensing procedure for halls would pose additional costs and result in an unnecessary layer of administration.

(i) The effect of bingo operations on other charitable fund raising activities and the impact of bingo operations on the community generally.

These matters are discussed in the chapter on social concerns arising from bingo and bingo halls (Chapter Two). Generally, there was substantive evidence presented that the growth of bingo had resulted in organizations putting less effort into other fund raising activities such as bottle drives or bake sales.

The general impact of bingo on the community is a more complex matter (as Chapter Two demonstrates), and social concerns provided important leverage in the Commission's decision to make recommendations that could change the scale, the control and the revenue distribution of the game across Saskatchewan.

The Future...

The Commission has spent some time thinking about the future of the game of bingo if the recommendations of this report are adopted.

Admittedly, there are risks and uncertainties. What will happen to the spending patterns of bingo players as consumers, particularly when major changes are made to prizes? What amounts will charities take home? What hall openings and closings will occur as the adjustment period takes place during the start of a new policy and regulatory system? It is difficult to answer these questions, and it points out the need for thoroughness and flexibility on the part of the proposed gaming authority and the Government which would oversee the implementation of recommendations.

Here, then, is a brief glimpse of what the Commission expects and hopes will be the future:

The largest crowd at a bingo hall will be about 300. Halls that hold less than 300 will also operate successfully and many of the organizations that have struggled unsuccessfully to keep their games going will be able to bring back their bingo nights and again raise money.

Bingo will never go back to what it was ten years ago. It will remain somewhat of a business, but the commercial gaming house environment will fade away and the bingo night will, above all things, be a social event. Players will still be thrilled with the prospect of winning a $1000 jackpot even though the dream of winning $20,000 or a car through the numbers on a bingo card will have evaporated. Since break-open tickets will not be peddled like peanuts, the bingo player will not spend as much for the evening out.

The commercial operator/owner will become merely a hall renter and will no longer be the dominating figure at a bingo hall. There will be little difference, if any, between commercial and non-commercial halls.

Bingo, along with other gaming activities, will become a more controlled and accountable game. The gaming authority will ensure that licensing provisions/ regulations are observed, right from the initial application for a license down to the accountability for expenditure of money on charitable purposes. The authority will function very adequately on the licensing fees it collects which, for bingo, will continue to be 2% of prizes. The principle of devoting these funds to gaming will be accepted by the public who remember how the game once was nearly out of control.

Bingo associations will successfully manage the bingo hall operations and will help ensure that their members are truly in need of funds for charitable purposes. The associations will train volunteers in running bingos.

With bingo operating on a smaller scale and being more controlled, many of the former concerns of local governments and many of the social problems that were associated with bingo, will be considerably lessened.

Appendices

29 May 1985

TO HIS HONOUR

THE LIEUTENANT GOVERNOR IN COUNCIL:

The undersigned has the honour to report that:

1 Section 2 of The Public Inquiries Act provides as follows:

> "2 The Lieutenant Governor in Council, when he deems it expedient to cause inquiry to be made into and concerning a matter within the jurisdiction of the Legislature and connected with the good government of Saskatchewan or the conduct of the public business thereof, or that is in his opinion of sufficient public importance, may appoint one or more commissioners to make such inquiry and to report thereon."

2 It is of sufficient public importance to cause inquiry to be made into and concerning Commercial Bingo Operations in the Province of Saskatchewan, and to appoint commissioners to make such an inquiry and report thereon.

The undersigned, therefore, has the honour to recommend that Your Honour's Order do issue, pursuant to section 2 of The Public Inquiries Act:

(a) appointing the following persons as commissioners of a Commission of Inquiry into Commercial Bingo Operations in the Province of Saskatchewan:

Norman McConnachie, Swift Current
Margaret Cuddington, Regina
Anne Matthews, Saskatoon

(b) designating Norman McConnachie as Chairman of the Commission of Inquiry;

(c) establishing the terms of reference of the said inquiry as shown in Schedule A attached hereto;

(d) authorizing remuneration to be paid by the Department of Consumer and Commercial Affairs to the commissioners at the rate of $165 for the chairman, and $110 for each other member of the Commission of Inquiry, for each day or part of the day that the chairman or member, as the case may be, is engaged in the work of the Commission of Inquiry;

(e) authorizing reimbursement by the Department of Consumer and Commercial Affairs for travelling and sustenance expenses in accordance with the tariff of travel and sustenance expenses approved under The Public Service Act for employees in the public service.

Recommended by: Joan H Duncan
Minister of Consumer and Commercial Affairs

Approved by:
A/ President of the Executive Council

Ordered by:
Lieutenant Governor
REGINA, Saskatchewan

SCHEDULE A
to O/C 596/85

SCHEDULE A

Terms of Reference
Commission of Inquiry into Commercial Bingo Operations in Saskatchewan

The Commission of Inquiry shall have responsibility to inquire into the role of commercial bingos in the Province of Saskatchewan by undertaking a study and evaluation thereof and, without limiting the generality of the foregoing, to inquire into, evaluate, study and report with respect to:

(a) The administration, allocation and distribution in Saskatchewan of bingo revenues including:

(i) the percentage distribution of gross revenues between expenses, prizes and charities at bingos conducted in commercial halls as opposed to non-commercial halls;

(ii) the revenue earned per event by charities in commercial halls as opposed to non-commercial halls;

(iii) the prize structure of bingo operations in the Province of Saskatchewan; and

(iv) the feasibility of developing prize limits.

(b) The provincial bingo licensing unit within Saskatchewan Consumer and Commercial Affairs including:

(i) the scope of activities, jurisdiction and functions;

(ii) its effectiveness; and

(iii) the adequacy of the regulations and procedures it utilizes for licensing the conduct and management of bingos in the province as compared with the policies and practices in other Canadian jurisdictions.

(c) The role and activities of commercial bingo hall operations.

(d) The role and activities of licensed charitable organizations conducting bingos in commercial bingo halls.

(e) The role and activities of licensed charitable organizations conducting bingos in non-commercial halls (community bingos).

(f) The impact on and inter-relationship between commercial and non-commercial bingo operations.

(g) The feasibility of a public interest procedure for allocating bingo event opportunities in commercial halls.

(h) The need for a specific licensing and regulatory program for commercial halls within the Province of Saskatchewan and, more specifically, the following:

(i) the location of halls within communities;

(ii) the need for some restriction on the number and size of commercial halls within communities;

(iii) the need to restrict commercial halls from communities below a specific size due to the potential impact on charities using non-commercial bingo halls.

(i) The effect of bingo operations on other charitable fund raising activities and the impact of bingo operations on the community generally.

The Report of the Commission of Inquiry to be received by December 31, 1985.

ORDERS IN COUNCIL

CRIMINAL CODE

(O.C. 1921/82)
November 24, 1982

To His Honour
The Lieutenant Governor in Council:

The undersigned has the honour to report that:

1. Pursuant to section 190 of the Criminal Code, the Lieutenant Governor in Council may set the terms and conditions under which licences to operate lotteries may be granted.

2. Your Honour established terms and conditions pursuant to that provision by way of Saskatchewan Regulations 91/78.

3. It is considered expedient to repeal those regulations and to establish new terms and conditions.

The undersigned has the honour, therefore, to recommend that Your Honour issue the Order shown below.

Recommended by:
Jack Sandberg
Minister of Consumer and Commercial Affairs
Gary Lane
Attorney General

Approved by:
Grant Devine
President of Council

ORDER

His Honour the Lieutenant Governor in Council, on the recommendation of the Minister of Consumer and Commercial Affairs and the Attorney General, pursuant to section 190 of the Criminal Code, makes The Lottery Licensing Provisions in accordance with the attached Schedule.

E. D. Bayda
Administrator

REGINA, Saskatchewan

SCHEDULE

Title

1. These terms and conditions may be cited as The Lottery Licensing Provisions.

INTERPRETATION AND GENERAL

Interpretation

2. In these provisions:

"breakopen"

(a) "breakopen" means a lottery scheme in which a predetermined number of cards are offered for sale at a predetermined price per card and in which the purchaser wins a prize, if any, as determined by the combination of symbols revealed on the card, but does not include a "scratch and win" type of card or ticket;

"charitable object or purpose"

(b) "charitable object or purpose" means any object or purpose for:

(i) the relief of poverty;

(ii) education;

(iii) sports, recreation and cultural activities;

(iv) the advancement of religion; or

(v) any other purpose beneficial to the community;

"charitable organization"

(c) "charitable organization" means an organization which has a charitable object or purpose and which operates without pecuniary gain to its members;

"director"

(d) "director" means the Director of Licensing and Investigation in the Department of Consumer and Commercial Affairs;

"local authority"

(e) "local authority" means:

(i) the council of a city, town, village or rural municipality or a municipal official designated in writing by the council; and

(ii) the Minister of Northern Saskatchewan or the Northern Administrator with respect to any district administered under The Northern Administration Act.

Licence

3. A licence to hold a lottery may be issued to a charitable organisation in accordance with these provisions.

Proceeds

4. All net proceeds from a lottery must be used for a charitable object or purpose.

Dates

5. A licence for the sale of lottery tickets shall specify the date for the lottery and the date on which sale of tickets may begin.

No sales outside province

6. No person licensed pursuant to these regulations shall sell lottery tickets outside Saskatchewan.

No remuneration for sales

7. No person shall be paid directly or indirectly to sell lottery tickets but individual sellers may be given not more than two free lottery tickets for selling 10 lottery tickets, and another charitable organization may share in the proceeds provided that share is used for a charitable object or purpose.

No remuneration for management

8. No person shall be paid directly or indirectly to manage or conduct a lottery or any part of it.

Additional terms and conditions

9. A licence may be subject, in addition to these provisions, to any terms and conditions that the local authority or the director, as the case may be, may determine.

Local authority

10. A local authority may issue a licence to a charitable organization to hold a lottery where:

(a) the lottery consists only of a raffle, bingo or guessing contest or wheels of fortune at a carnival or bazaar;

(b) the total amount or value of all prizes offered in any one lottery does not exceed $1,000;

(c) in the case of wheels of fortune or bingo games at a carnival or bazaar operated for a period not exceeding one week:

(i) each prize does not exceed $100 in value; and

(ii) the money or other valuable consideration paid to secure a chance to win a prize does not exceed 50 cents;

(d) in the case of bingo games held during one 24-hour period:

(i) the amount or value of all prizes awarded does not exceed $1,000, except for a special bingo game with a limited number of numbers being called where a special prize or jackpot with a prize not exceeding $600 is offered as part of the $1,000 total at the first bingo game, which special prize or jackpot, if not won, may increase from week to week up to a limit of $1,000 and remain at that limit until won; and

(ii) only one licence per week is issued to the charitable organization.

Forms

11. A licence issued by a local authority shall be in Form A, B or C, as the case may be, with any modifications that the local authority, in its discretion, considers appropriate.

Fees

12. The fee payable to a local authority for issuing a licence shall not exceed:

(a) $5; or

(b) where a licence is issued authorizing a series of lotteries in any calendar year, $50.

Statements

13. Every local authority shall, on or before April 1 in each year, file a statement with the director specifying with respect to each licence issued during the preceding year:

(a) the name of each charitable organization receiving a licence;

(b) the amount or value of each prize awarded;

(c) the total amount of money received for all lottery tickets;

(d) the total expenses incurred for each lottery;

(e) the amount available for each charitable object or purpose; and

(f) the purpose for which the proceeds were or are to be used.

DIRECTOR

Director

14. The director may issue a licence to a charitable organization to hold a lottery where:

(a) the lottery consists only of a raffle, bingo, breakopen or guessing contest;

(b) in the case of a raffle, the total amount of all prizes offered does not exceed $100,000;

(c) in the case of bingo games held during one 24-hour period, the amount or value of all prizes awarded does not exceed $25,000.

Class A or B exhibition board

15. Notwithstanding section 14, the director may, on any terms and conditions that he considers advisable, issue to a Class A or B exhibition board a licence to conduct games of chance or mixed chance and skill at a casino in conjunction with an annual agricultural fair or exhibition operated by the exhibition board.

Form of licence

16. A licence issued by the director may be in any form that he determines.

Fees payable to director

17.(1) The fee payable to the director for issuing a licence is:

(a) in the case of a raffle, bingo, breakopen or guessing contest, 2% of the total retail value of all goods, wares, merchandise or cash awarded as prizes in all lotteries conducted, with an initial $10 deposit at the time of application;

(b) in the case of a casino operated by a Class A exhibition board, $100 per day of operation; and

(c) in the case of a casino operated by a Class B exhibition board, $50 per day of operation.

(2) Percentage fees, less any initial deposit, are payable to the director on demand and are to be rounded down to the nearest $10.

ORGANIZATION

Inspection, financial statement

18. Where a charitable organization receives a licence pursuant to these provisions, it shall:

(a) keep an account of all expenditures made from the proceeds of the licensed lottery and make such accounts and other documents available for inspection by any member of a police force or by anyone authorized to inspect them by the local authority or the director; and

(b) after the conclusion of the lottery, file on or before December 31 or within three months, whichever is later, a financial statement certified as correct by two officers of the organization, showing in detail:

(i) the expenditures made with respect to each lottery;

(ii) the amount available for the charitable object or purpose; and

(iii) the expenditures on account of such object or purpose or the intended expenditures.

Exemption from filing

19. Where a lottery licence issued by a local authority to an organization does not authorize prizes in excess of $200, the local authority may, in its discretion, exempt that organization from filing the financial statement required by clause 18(b).

Repeal

20. Saskatchewan Regulations 91/78 are repealed.

Coming into force

21. These terms and conditions come into force on December 1, 1982.

THE LEGISLATIVE ASSEMBLY AND EXECUTIVE COUNCIL ACT

(O.C. 733/84)
28 June 1984

To His Honour

The Lieutenant Governor in Council:

The undersigned has the honour to report that:

1. Section 71 of The Legislative Assembly and Executive Council Act provides, in part, as follows:

"71.(1) The Lieutenant Governor in Council may, from time to time, prescribe the duties of the officers appointed under section 70 and of the several departments over which any of them shall preside or to which they shall belong and of the employees of those departments.

Recommended by:

Minister of Consumer
and Commercial
Affairs

Attorney General

Approved by:

President of the
Executive Council

ORDER

His Honour the Lieutenant Governor in Council, on the recommendation of the Minister of Consumer and Commercial Affairs and the Attorney General, pursuant to section 190 of the *Criminal Code*, makes *The Lottery Licensing Amendment Provisions, 1984 (No. 2)* in accordance with the attached Schedule.

Lieutenant Governor
REGINA,
Saskatchewan

SCHEDULE

Title

1 These provisions may be cited as *The Lottery Licensing Amendment Provisions, 1984 (No. 2)*.

O.C. 1921/82

2 *The Lottery Licensing Provisions*, established by way of Order in Council 1921/82 and dated November 24, 1982, as amended by Order in Council 594/84 and dated May 29, 1984, are amended in the manner set forth in these provisions.

Section 2 amended

3 The following clauses are added after clause 2(c):

"commercial operator"

"(c.1) 'commercial operator' means a person engaged in the business of renting premises to a licensed organization in which to conduct a bingo event or series of bingo events;

"commercial hall"

"(c.2) 'commercial hall' means the premises of a commercial operator that are used for a bingo event".

New section 8.1

4 The following section is added after section 8:

Commercial bingo halls

"8.1(1) No charitable organization shall be licenced to conduct a bingo in a commercial hall except in accordance with this section.

"(2) A charitable organization which applies for a licence to conduct a bingo in a commercial hall shall:

(a) enter into a fixed amount rental agreement with the commercial operator with respect to the use of the commercial hall for the bingo; and

(b) file with the application for a licence a copy of the agreement mentioned in clause (a).

"(3) An agreement mentioned in clause (2)(a) shall set out separately the rental fee and any other items such as caller fees and the cost of supplies.

"(4) No increase in the rent payable pursuant to an agreement mentioned in clause (2)(a) is to be made without the prior written approval of the registrar.

"(5) A charitable organization which is granted a licence to conduct a bingo in a commercial hall shall:

(a) control and supervise every aspect of the bingo event, including the collection of money and the payment out of prizes;

(b) ensure that all advertising with respect to the bingo event bears the licence number issued by the registrar and the name of the licensee;

(c) open and maintain a separate bank depository and accounting system for funds from bingo events, keep a record of all receipts and disbursements and retain any proceeds remaining after payment of expenses in that depository until they are used for the authorized charitable object or purpose;

(d) retain all records relating to the bingo event, including working papers for each event, for at least 12 months after the event.

"(6) In no event shall the expenses, other than prizes, associated with a bingo event held in a commercial hall exceed 20% of the gross revenue of the event.

"(7) A commercial operator shall not:

(a) charge or receive any consulting fee with respect to the operation of a bingo;

(b) share in any profits raised by the charitable organization at the bingo.

"(8) A commercial operator may:

(a) provide bingo supplies at a reasonable rate for a bingo event;

(b) operate a concession at a bingo event".

Coming into force

5 These provisions come into force on the day on which the Order making them is signed by the Lieutenant Governor.

Saskatchewan Commercial Bingo Inquiry
1871 Smith Street
Regina, Saskatchewan
S4P 3V7

November 22, 1985

Honourable Joan H. Duncan
Minister
Consumer and Commercial Affairs
Room 348
Legislative Building
REGINA, Saskatchewan

Dear Mrs. Duncan:

During the course of the Saskatchewan Commercial Bingo Inquiry, a number of urgent issues have been identified. Presented below is a list of items which the Inquiry members recommend the Department of Consumer and Commercial Affairs act upon as soon as possible.

1. Bingo licences should state the date and also the time of each event being licensed. Under the current system whereby licences may include more than one event on the same day, the department does not know how many events have been licensed or how many should be accounted for on the reporting forms.

2. The department needs to have a complete listing of all of the licensed events by hall and by month. This could be accomplished by asking each hall operator to provide a day-by-day list of the events to be held in that hall. (See attached sample for Regina Bingo Palace.)

As the licences are granted the sponsor's name and the licence number would be entered on the sheet. It will then be obvious whether or not all events have been licensed.

These sheets would be kept in a loose-leaf binder with tabs for each hall.

The binder should contain, for each hall, the current month plus all future months for which any licences have been issued.

At the end of each month the pages for that month could be removed to a non-current file and kept for reference purposes.

Copies of the appropriate pages could be sent each month to the local police departments. By knowing that all events have been licensed, the department will know when reports have been received for each licence that reports have been received for all events.

It appears under the present system that the department does not know whether all events have been licensed and hence whether all events are being reported.

How might the list be useful to the police? One example: if they noticed a Midnight Madness going on at 12:00 a.m. on December 12 at Regina Bingo Palace they would know from the list that it was an unlicensed event.

3. The reporting forms for each licence and the statistics based on these forms need to show the number of events. This information appears to have been deleted from the current forms.

4. Mr. MacGillivray made statements at the Inquiry concerning the 2% government levy as it relates to non-cash prizes, jackpot amounts provided by the hall and promotional draws, etc. Some hall operators questioned us, following these statements, as to whether cars could be given away as promotions without paying the 2%. We believe that the department should clarify their policy by a letter to all hall operators. We would appreciate a copy of any such letter which may be sent.

5. We are concerned that the department has allowed hall operators to continue to charge expenses which are more than 20%. For example, the gross sales for Queen City bingo for 1984-85 were $4.4 million. If the operator took 2% too much, then he pocketed $88,000 which should have gone to charity. If he charged 4% too much, then he pocketed $176,000 which should have gone to charity.

   Halls with average gross sales of $5,000 or more should be required to meet the 18% or 20% figures immediately.

   It appears to the Inquiry that by allowing charges of 20% to 25% for expenses, hundreds of thousands of dollars have gone to hall operators which should have been going to the sponsoring charities.

6. We are concerned about games being played in bingo halls where the sales are not being handled by the sponsors and where the hall operator or his agent is pocketing the proceeds. The police had advised of the difficulty in trying to prosecute these cases. It appears to us that the department does, nonetheless, have an available means to prevent this from happening. Hall operators should be advised that sponsors for their halls will

immediately be cancelled if any such illegal games are discovered. Sponsors should also be advised of their responsibility to prevent any such illegal games and should be made aware that sponsor's licences will be cancelled if any such illegal games occur.

Sincerely,

Norman McConnachie
Chairman

SAMPLE ONLY

REGINA BINGO PALACE

December		Sponsor	Licence Number
2	1:00 p.m.		
2	7:00 p.m.		
3	1:00 p.m.		
3	7:00 p.m.		
4	1:00 p.m.		
4	7:00 p.m.		
5	1:00 p.m.		
5	7:00 p.m.		
6	1:00 p.m.		
6	7:00 p.m.		
6	11:00 p.m.		
7	1:00 p.m.		
7	7:00 p.m.		
7	11:00 p.m.		
9	1:00 p.m.		
9	7:00 p.m.		
10	1:00 p.m.		
10	7:00 p.m.		
11	1:00 p.m.		
11	7:00 p.m.		
12	1:00 p.m.		
12	7:00 p.m.		
13	1:00 p.m.		
13	7:00 p.m.		
13	11:00 p.m.		
14	1:00 p.m.		
14	7:00 p.m.		
14	11:00 p.m.		

LOTTERY LICENSING ACTIVITY

					DEPARTMENT								MUNICIPAL			Total Spending
Fiscal Year		Licences Issued	Events/Days	No. Completed	Gross Spending	Prizes	%	Expenses	%	Charity	%	Lotteries Outstanding	Municipal Licences Issued	No.	Gross Spending	Prov. Gross Spending (Bingos, Raffles & Casino)
80/81	Bingo	75	742	69	1,999,424	999,583	50	465,298	23	534,543	27	50	Bingo	330	5,630,115	$7,629,535
	Raffle	454	1,751	387	3,779,914	1,622,284	43	392,013	10	1,765,617	47	308	Raffle	856	774,763	4,554,677
	Casino	20	81	16	4,557,689	3,343,693	73	535,301	12	678,695	15	10	-	-	-	4,557,689
	Total	549	2,574	472	10,337,027	5,965,560	58	1,392,612	13	2,978,855	29	368	Total	1,186	6,404,878	$16,741,905
81/82	Bingo	103	1,050	84	2,199,744	1,111,447	51	485,067	22	603,230	27	69	Bingo	446	6,670,239	$ 8,869,983
	Raffle	569	3,487	496	8,440,349	3,987,275	47	804,857	10	3,648,217	43	381	Raffle	1,160	1,105,785	9,546,134
	Casino	23	102	22	5,471,098	3,990,393	73	659,557	12	821,148	15	11	-	-	-	5,471,998
	Total	695	4,639	602	16,111,191	9,089,115	56	1,949,481	12	5,072,595	32	461	Total	1,606	7,776,024	$23,887,215
82/83	Bingo	268	1,735	214	4,599,167	2,585,802	56	858,965	19	1,154,400	25	123	Bingo	293	4,720,270	9,319,437
	Raffle	630	4,798	602	8,961,230	4,597,839	31	1,123,970	13	3,239,421	36	409	Raffle	900	907,758	9,868,988
	Casino	27	123	27	6,712,240	4,907,240	73	780,140	12	1,024,860	15	11	-	-	-	6,712,240
	B'Open	818	82	37	65,011	45,512	70	4,306	7	15,193	23	781	-	-	-	65,011
	Total	1743	6,748	880	20,337,648	12,136,393	60	2,767,381	13	5,433,874	27	1,324	Total	1,193	5,628,028	$25,965,676
83/84	Bingo	953	3,391	665	11,965,045	7,393,539	62	2,543,900	21	2,027,606	17	411	Bingo	334	3,986,014	15,951,059
	Raffle	673	4,111	609	7,125,389	2,993,135	42	770,814	11	3,361,440	47	473	Raffle	972	991,652	8,117,041
	Casino	28	132	30	7,521,927	5,607,772	75	864,648	11	1,049,507	14	9	-	-	-	7,521,927
	B'Open	1514	19,214	834	16,296,525	11,825,883	73	1,197,456	7	3,273,186	20	1461	-	-	-	16,296,525
Totals		3168	26,848	2138	42,908,886	27,820,329	65	5,376,818	12	9,711,739	23	2354	Total	1306	4,977,666	47,886,552
84/85	Bingo	1906	7,039	1239	30,365,588	19,676,325	65	6,730,822	22	3,958,441	13	1078	Bingo	411	3,123,853	33,489,441
	Raffle	683	3,641	599	8,183,400	3,580,096	44	1,222,613	15	3,380,691	41	557	Raffle	944	1,096,750	9,280,150
	Casino	34	134	31	9,562,852	7,325,040	77	1,051,130	11	1,186,682	12	12	-	-	-	9,562,852
	B'Open	2569	34,099	1120	33,819,169	24,241,755	72	2,540,207	07	7,037,207	21	2910	-	-	-	33,819,169
Totals		5192	44,913	2989	81,931,009	54,823,216	67	11,544,772	14	15,563,021	19	4557	Total	1355	4,220,603	86,151,612

Commercial Bingo Halls

Statistics for 8 Months 1985/86
April to November

	Gross Revenue from Bingo	Prizes	%	Expenses	%	Charity	%
Bingo + Nevada	---------	------	---	------	---	------	---
Bridge City Bingo	1,138,530	836,889	73.5	251,405	22.1	50,255	4.4
Centennial Bingo	1,117,359	821,529	73.5	227,418	20.4	68,412	6.1
Challenger Bingo	802,855	620,199	77.3	160,697	20.0	21,965	2.7
Confederation Bingo	1,339,526	962,141	71.8	282,234	21.0	95,572	7.1
Diamond Bingo	795,023	663,920	84.0	143,664	18.1	(17,018)	(2.1)
Dreamland Bingo Fort Qu'Appelle	476,999	343,077	71.9	85,203	17.9	48,719	10.2
Estevan Community Bingo	121,183	75,007	61.9	29,719	24.5	16,457	13.6
Evergreen Bingo (Nipawin)	-------	------	---	------	----	------	----
La Ronge Bingo Castle	33,307	24,761	74.3	6,727	20.2	1,801	5.4
Lloydminster Community Bingo	471,585	355,659	75.4	104,929	22.3	11,000	2.3
Manhattan Ballroom Saskatoon	24,900	16,216	65.1	5,850	23.5	2,834	11.4
Meadow Lake Bingo Palace	259,665	208,202	80.2	35,890	13.8	15,559	6.0
Moose Jaw Bingo	948,708	626,152	66.0	189,444	20.0	133,033	14.0
Moose Jaw Bingo Centre	78,642	70,107	89.2	9,297	11.8	(760)	(1.0)
Nevada B's	266,534	229,707	86.2	56,733	21.3	(19,899)	(7.5)
North Battleford Bingo Palace	1,270,803	816,659	64.3	293,026	23.1	161,103	12.7
Parkland Bingo (Yorkton)	208,090	154,752	74.4	37,271	17.9	16,069	7.7
Prince Albert Bingo	1,670,619	1,070,841	64.1	381,876	22.9	217,910	13.0
Queen City Bingo (Regina)	2,819,145	1,739,289	61.7	677,816	24.0	402,034	14.3
Regina Bingo Palace	1,658,759	1,212,041	73.1	328,958	19.8	117,770	7.1

Continued to page 164

Continued from page 163

	Gross Revenue from Bingo	Prizes	%	Expenses	%	Charity	%
Saskatoon Bingo Palace	1,463,372	1,136,012	77.6	318,528	21.8	13,448	0.9
Saskatoon Bingo Royale	236,613	204,481	86.4	46,442	19.6	(14,287)	(6.0)
Saskatoon World Bingo	704,901	577,324	81.9	115,072	16.3	11,835	16.8
Swift Bingo (Swift Current)	422,432	273,105	64.7	108,420	25.7	40,922	9.7
Weyburn Community Bingo	246,320	157,682	64.0	54,581	22.2	34,050	13.9
Yorkton P.K Bingo Palace	1,676,406	1,203,865	71.8	296,132	17.7	176,119	10.5
Total	19,252,276	13,399,617	69.6	4,247,332	22.1	1,604,933	8.3

Non-Commercial Bingo Halls

	Gross Revenue from Bingo	Prizes	%	Expenses	%	Charity	%
Golden Dabbers Yorkton	190,169	153,266	80.6	46,614	24.5	(9,709)	(5.1)
Lloydminster Amasis #18	99,859	83,000	83.2	19,590	19.6	(2,749)	(2.8)
Saskatoon Lucky Horseshoe Bingo	426,578	336,475	78.9	78,376	18.4	11,727	2.8
P.A. Club Bingo	2,466,944	1,260,405	51.1	722,290	29.3	483,969	19.6
Regina Community Bingo	731,606	542,269	74.1	102,850	14.1	86,489	11.8
Regina Lions Bingo	--------	-------	---	------	----	------	----
Regina Turvey Centre	132,031	60,283	45.7	30,875	23.4	40,873	30.9
Three C's Bingo (Regina)	205,225	200,760	97.9	43,203	21.1	(38,737)	(18.9)
Saskatoon Silver Dollar Bingo	16,794	14,675	87.4	1,395	8.3	725	4.3
Yorkton High Rollers Bingo	136,307	117,933	86.5	29,534	21.7	(1,362)	(1.0)

Taking Part in ...

The Saskatchewan Commercial Bingo Inquiry

Chair:
Norman McConnachie

Members:
Margaret Cuddington
Anne Matthews

What Is the Law?

Under the Criminal Code of Canada the provinces are responsible for licensing and regulating bingo. Only charitable or religious organizations may be licensed to conduct bingo operations.

In Saskatchewan licensing is done by the Department of Consumer and Commercial Affairs.

No licences to conduct bingos in new commercial halls will be issued to charitable organizations by the Department of Consumer and Commercial Affairs until the Inquiry report has been published and considered by the Government.

Why a Public Inquiry?

In announcing a public inquiry into commercial bingo operations in Saskatchewan, Consumer and Commercial Affairs Minister Joan Duncan referred to "the public concern which has been expressed about commercial bingo halls in general, and which has been building since the first commercial hall received approval in 1981."

What Are the Concerns?

The terms of reference (on the last page of this brochure) will allow the Commission to study the areas where concerns have been raised. Some examples of the concerns which have been raised are:

1. Money

   How should money be divided up at commercial bingo halls among expenses paid to the hall owners, prizes paid to bingo players and revenues going to charities? Also, to what purposes are charitable revenues from bingos distributed within the community?

2. Impact

   What is the effect of commercial halls on smaller, non-commercial halls, on other charitable fund raising activities and on the community?

3. Regulation

   Should there be a limit on the amount of prizes or jackpots? Should the number, size, or location of commercial bingo halls be limited through a new system of provincial regulations? Should there be regulations covering all or most activities that occur within bingo halls?

4. Administration

Who should administer bingo licensing and regulations that might affect commercial and non-commercial bingo halls? What should be the role of government?

Who May Participate in the Inquiry?

The Saskatchewan Commercial Bingo Inquiry report and recommendations may greatly change the way bingo operations are conducted in Saskatchewan. Accordingly, the Inquiry expects to hear from: commercial owners and operators of bingo halls, bingo suppliers, charitable organizations who use commercial halls or operate their own halls, bingo players, or other interested individuals.

How Can You Take Part?

- By written submission (often the most effective means of participating in an inquiry). You should give notice that you intend to participate in the Inquiry by September 16, 1985, and you must mail your written submission by September 27, 1985.
- By sending a letter or calling collect, (306) 787-2744, before September 16, 1985, to say that you intend to appear at a public hearing. The Commission will endeavor to arrange a convenient location for you to appear as a witness.
- By coming to the hearing in your area and stating your views.

Submissions and notices of intentions should be sent to:

Ralph F. Smith, Secretary
Saskatchewan Commercial Bingo Inquiry
1871 Smith Street
Regina, Saskatchewan
S4P 3V7

Watch your local paper for the date, time and location of the hearing in your area.

For more information about the inquiry, call (306) 787-2744, collect from anywhere in Saskatchewan.

Terms of Reference
Saskatchewan Commercial Bingo Inquiry

The Commission of Inquiry shall have responsibility to inquire into the role of commercial bingos in the Province of Saskatchewan by undertaking a study and evaluation thereof and, without limiting the generality of the foregoing, to inquire into, evaluate, study and report with respect to:

(a) The administration, allocation and distribution in Saskatchewan of bingo revenues including:

(i) the percentage distribution of gross revenues between expenses, prizes and charities at bingos conducted in commercial halls as opposed to non-commercial halls;

(ii) the revenue earned per event by charities in commercial halls as opposed to non-commercial halls;

(iii) the prize structure of bingo operations in the Province of Saskatchewan; and

(iv) the feasibility of developing prize limits.

(b) The provincial bingo licensing unit within Saskatchewan Consumer and Commercial Affairs including:

(i) the scope of activities, jurisdiction and functions;

(ii) its effectiveness; and

(iii) the adequacy of the regulations and procedures it utilizes for licensing the conduct and management of bingos in the province as compared with the policies and practices in other Canadian jurisdictions.

(c) The role and activities of commercial bingo hall operations.

(d) The role and activities of licensed charitable organizations conducting bingos in commercial bingo halls.

(e) The role and activities of licensed charitable organizations conducting bingos in commercial halls (community bingos).

(f) The impact on and inter-relationship between commercial and non-commercial bingo operations.

(g) The feasibility of a public interest procedure for allocating bingo event opportunities in commercial halls.

(h) The need for a specific licensing and regulatory program for commercial halls within the Province of Saskatchewan and, more specifically, the following:

(i) the location of halls within communities;

(ii) the need for some restriction on the number and size of commercial halls within communities;

(iii) the need to restrict commercial halls from communities below a specified size due to the potential impact on charities using non-commercial bingo halls.

(i) The effect of bingo operations on other charitable fund raising activities and the impact of bingo operations on the community generally.

The Report of the Commission of Inquiry to be received by December 31, 1985.

Saskatchewan Commercial Bingo Inquiry
1871 Smith Street
REGINA, Saskatchewan
S4P 3V7

August 26, 1985

Dear Sir or Madam:

As you may be aware from my previous letter and the accompanying brochure, the Saskatchewan Commercial Bingo Inquiry is functioning under the authority of the Public Inquiries Act of Saskatchewan. At present, we are inviting written submissions and appearances of witnesses at public hearings. We may, at a later date, exercise the authority under the Public Inquiries Act to enforce the attendance of witnesses and to require documents and other materials to be submitted as evidence.

As a licencee at a bingo hall, you are in the position to have certain views and to possess certain records that are particularly relevant to the Inquiry, and I am taking this opportunity to request these from you. First, however, I would like to give you some background to the Inquiry.

It is the Commission's understanding that bingo operations across Canada and the U.S. have become a subject of controversy. Some provinces and states have made major adjustments to regulations affecting bingo and other gaming activities while, in other jurisdictions, like Saskatchewan, commissions of inquiry are considering the pros and cons of a wide variety of regulations.

In Saskatchewan, since the initial licensing of commercial bingo halls in 1982, there has been a marked reduction in the percentage of the total proceeds that ends up with the sponsoring charity. The percentage paid in prizes has increased significantly and the percentage paid to hall operators as expenses has also increased during each of the past two years, according to government figures.

Therefore, there are some questions that we expect will be raised during the course of public hearings:

a. Should licences to conduct bingos in commercial bingo halls continue to be issued?

b. What regulations should apply to the division of revenues to players (prizes), hall operators (expenses), and licencees (charities)?

c. How should the regulations be administered?

In addition, the Commission has been asked to look into the role of charitable money earned through bingos at commercial and non-commercial halls. In other words, to what charitable purposes do dollars flow in the community as a result of bingo and sales of break-open tickets within bingo halls? How important is bingo in the total picture of charity fund-raising? The recommendations made by the Commission may have a considerable impact on charitable revenue, and so we will be examining this issue in some detail. We rely upon your response to the enclosed questionaire as our basic means of gaining information in this area.

The Commission encourages you to appear at a public hearing to respond to questions in regard to the attached questionaire and any other submission you wish to make (your response to the questionaire can serve as your submission).

In your submission, we would also appreciate any comments you may have concerning issues that arise from the terms of reference of the Inquiry, as listed in the brochure I sent you in an earlier mailing.

Your response should be received by the Secretary of the Commission by September 27, 1985.

Please submit information and address any questions you may have to :

Ralph F. Smith, Secretary
Saskatchewan Commercial Bingo Inquiry
1871 Smith Street
REGINA, Saskatchewan
S4P 3V7

Phone: 787-2744, collect

Sincerely,

Norman McConnachie, Chairman

Attach.

DO YOU INTEND TO SPEAK AT PUBLIC HEARINGS?

__________ Yes __________ No

Where? __________________

REFERENCE # __________

QUESTIONAIRE -- BINGO LICENCEES

PART A

1. Licencee Name: ______________________________
2. Contact Person: ______________________________
   Address: ______________________________
   Telephone No: ______________________________
3. Purpose of the Organization: ______________________________
   ____
   ____
4. Who (what group) benefits from your fund-raising?
   ____
   ____
   ____
5. Are you a registered society? __________
   Charitable or membership? ______________________________
6. How long has your organization existed? ____________________
   How long have you been running bingos? ____________________
7. How many members have you? ____________________
8. Where do you hold your bingos? (individual's name, company, name of hall)
   ____
   ____
   Who is the manager? ______________________________
9. What are the hall expenses? How are they calculated? (provide details)
   ____
   ____
   ____
   ____

Questionaire -- Bingo Licencees
Page 2

---

10. What happens if you have a bad night? ______________________________

11. Is there a sponsor's association in the hall? ____________________

If so, what does the association deal with? ____________________

12. Do you generally feel that you are allowed to run your bingo the way you want to? (i.e., controlling cash, controlling prizes, giving orders to workers)

13. Do you pay all of your expenses by cheque? __________

If no, how do you pay them? ______________________________

14. Do you have a separate bank account to handle the funds from the bingo? __________ If no, how do you handle these funds?

15. Do you have an accounting system which ensures that your bingo proceeds are spent only on the charitable projects described in your licence application form? __________ If no, how do you operate concerning this matter?

16. Do you have a policy which disallows your members from playing bingo at sessions where you are the sponsor?

17. How many persons are necessary to operate the bingo? __________

18. Are all of these persons members of your organization? __________

If no, who are they? ______________________________

19. Do you pay a salary or any other expense or remuneration to any worker for working at the bingo? If so, explain:

20. Provide the following budget information:

	1981	1982	1983	1984	1985
Number of bingo events					
Gross revenues					
Prizes					
Expenses					
Net to sponsor					
Break-open (nevada) profits					
From Sask Sport					
Other sources of revenue					
TOTAL REVENUES:					

21. If applicable, how did you raise funds prior to bingos or prior to a considerable increase in revenues as a result of bingos?

22. Describe in detail what you have accomplished as a result of bingo revenues:

____

____

____

____

____

____

Part B

We would appreciate your comments concerning any or all of the following questions (attach additional sheets of paper, if you wish):

1. Should licences to conduct bingos in commercial bingo halls continue to be issued?

2. Should commercial bingo halls be run by the Government?

3. Should the size of bingo halls be limited? If so, to what number of seats?

4. Should the number of bingo halls be limited? If so, what should these limits be based upon? (i.e. existing levels? the size of the community?) Commercial halls only, or all bingo halls over a certain size?

5. Should the days or hours of operation be limited? To what?

6. Should the total prize value of a bingo session be limited?

7. Should accumulating jackpots be disallowed or be limited? What should the regulations be in regard to accumulating jackpots?

8. Is the present system of being assigned to specific bingo events working satisfactorily?

9. Would it be feasible and/or desirable to have a public interest procedure for allocating bingo event opportunities in commercial halls? What would you specifically recommend on this matter?

10. Should commercial bingo halls be licensed? What provisions should such a licence contain?

11. Who should administer the regulations applicable to bingo halls?

12. Are you satisfied with your contractual arrangements with the bingo hall operator? (if applicable) If not, what would you recommend to remedy problems? (explain both problems and your proposed solutions)

13. Is crime possible or probable in regard to bingo and break-open (nevada) operations? Are there any regulations you would recommend to minimize the chance of crime?

14. Has bingo income changed the purpose and/or the structure of charitable organizations?

15. Should break-open (nevada) tickets be sold in bingo halls?

16. Do you have any other comments?

On this page list all bingo events you held during March, 1985 and also during July, 1985.

I. MARCH, 1985

DATE AND NAME OF HALL	BINGO LICENCE #	BINGO GROSS REVENUE	BINGO EXPENSES	BINGO EARNINGS	BREAK-OPEN EARNINGS

II. JULY, 1985

DATE AND NAME OF HALL	BINGO LICENCE #	BINGO GROSS REVENUE	BINGO EXPENSES	BINGO EARNINGS	BREAK-OPEN EARNINGS

Saskatchewan Commercial Bingo Inquiry
1871 Smith Street
REGINA, Saskatchewan
S4P 3V7

August 26, 1985

Dear Sir or Madam:

As you may be aware from my previous letter and the accompanying brochure, the Saskatchewan Commercial Bingo Inquiry is functioning under the authority of The Public Inquiries Act of Saskatchewan. At present, we are inviting written submissions and appearances of witnesses at public hearings. We may, at a later date, exercise the authority under The Public Inquiries Act to enforce the attendance of witnesses and to require documents and other materials to be submitted as evidence.

As an operator of a bingo hall, you are in the position to have certain views and to possess certain records that are particularly relevant to the Inquiry, and I am taking this opportunity to request these from you. First, however, I would like to give you some background to the Inquiry.

It is the Commission's understanding that bingo operations across Canada and the U.S. have become a subject of controversy. Some provinces and states have made major adjustments to regulations affecting bingo and other gaming activities while in other jurisdictions, like Saskatchewan, commissions of inquiry are considering the pros and cons of a wide variety of regulations.

The Commission is particularly interested in the expenses, including rent, that apply to the various types of bingo operations. Government figures show that the percentage of total proceeds going towards expenses in bingo halls has increased during each of the past two years, and we would like to gain an understanding of the basis of such expenses and the increases involved.

Specifically, we are asking you to submit financial statements and to answer a questionaire. Financial statements, if unaudited, should be accompanied by an affidavit sworn before a notary public or commissioner of oaths that the information provided is accurate and consistent with that filed for purposes of income taxes.

The financial statement should be used to fill in Part B of the attached questionaire, and the information in your statement and that which is listed in Part B should be clearly consistent.

Please also be advised that the Commission will keep the information in your financial statement and in Part B of the questionaire confidential if you can show good reason that such information should not be made public. The Commission will, however, use the above financial information for purposes of publishing aggregate or average financial data on commercial bingo operations in Saskatchewan.

The Commission also requests you to appear at a public hearing in a location of your choice to respond to questions in regard to all, or to Part A, of the attached questionaire. In addition, as part of your submission to the Inquiry, we would appreciate your comments on the following:

1. Have commercial bingo halls had an impact upon your bingo hall? (explain)

---

2. Should the size of bingo halls be limited? If so, to what number of seats?

3. Should the number of bingo halls be limited in relation to the size of the community?

4. Should the days or hours of operation be limited?

5. Should the total prizes in a session be limited?

6. Should accumulating jackpots be limited? If so, how? Should accumulating jackpots be disallowed? Why or why not?

For non-commercial operators that hold events under rental agreements with other charities:

Is the present system of having bingos manned by the sponsoring charities working satisfactorily?

a. Do they keep their scheduled dates?
b. Do they provide enough workers?
c. Do they provide capable workers?

7. Do you have enough sponsors? Do you have too many potential sponsors?

In your submission, we would also appreciate any comments you may have on issues arising from any of the terms of reference of the Inquiry, as listed in the attached brochure.

Please submit information and address any questions you may have to:

Ralph F. Smith, Secretary
Saskatchewan Commercial Bingo Inquiry
1871 Smith Street
REGINA, Saskatchewan
S4P 3V7

Phone: 787-2744, collect.

I will appreciate your co-operation with the Inquiry.

Sincerely,

Norman McConnachie, Chairman

Attach (2)

QUESTIONAIRE -- NON-COMMERCIAL BINGO HALLS

PART A

1. Name of Hall: ______

2. Address and Telephone Number: ______

3. Name of owner(s): ______

Does your organization own or operate other bingo halls? (which ones?)

______

4. How long has the hall been used for bingo? ______

What was it used for before? ______

5. Is the hall a whole building? ______

Part of a building? ______

Is there a licensed beverage lounge in the building? ______

Is the hall used exclusively for bingos. ______

Specify any other uses: ______

6. Approximate floor area used for bingo: ______

7. When is bingo played?

	No./week	Prizes	Average Attendance
Evenings			
Matinees			
Midnight Madness			
Other			

Capacity (full house) ______

8. What were the sizes of jackpots won during the past two years, the dates upon which they were won and the number of people present for the winning event?

Jackpot Size	Date	Number Present

9. What method do you use to accumulate jackpots?

Who keeps the jackpot trust account?

10. How do you calculate hall rental rates? What is included in the rent?

11. Do you supply callers to the groups?

How much are they paid and who pays them?

Do you supply any other personnel?

If so, what do they do?

How much are they paid?

12. Bingo Paper:

Where do you buy the paper? ______________________

How much do you charge groups for paper?

13. What arrangements do you make with groups for sale of break-open tickets?

14. Do you have a standard contract between yourself and licencees? ______________ Attach a copy of your current contract and all contracts used since the start of 1984.

15. How do you determine whether or not a charity will be given access to your hall?

16. Have the groups formed a sponsor's association?

17. Who does the advertising? ______________________

18. What are the criteria for allocating events to charities? (i.e., How does a charity get a prime night?)

19. Do you play a role or make rules concerning the way money is handled in your hall?

____

____

____

____

20. Are there rules that apply to charities and/or bingo players in your hall? ________________ (Provide a copy)

21. Provide the following information:

	January-December 1983 (12 mos.)	January-December 1984 (12 mos.)	January-June 1985 (6 mos.)
Days of bingo operation			
Number of bingo events			
Number of different sponsors			

Part B

(Financial Information - To Accompany Financial Statements)

	Jan. - Dec. 1983	Jan. - Dec. 1984	Jan. - June 1985 (6 mos)
INCOME:			
(From licencees)			
Hall Rental			
Break-open booth rental			
Caller fee			
Bingo paper			
Break-open tickets			
Advertising fees			
Other charges			
Other income (specify)			
TOTAL INCOME:			
EXPENSES OF OPERATOR:			
Rent			
Interest			
Maintenance			
Property taxes			
Telephone, Heating Electricity,			
Advertising			
Cost of caller			
Salaries: (specify job performed & list each separately)			

Questionaire -- Non-Commercial Bingo Halls
August 26, 1985

	Jan. - Dec. 1983	Jan. - Dec. 1984	Jan. - June 1985(6 mos)
Cost of bingo paper	________	________	________
Cost of break-open paper	________	________	________
Other expenses (specify)	________	________	________
	________	________	________
	________	________	________
	________	________	________
Total Expenses	________	________	________
NET PROFIT ON OPERATIONS	________	________	________

On this page and the next, list information relating to bingo events during March, 1985 and July, 1985. If you have more than one event per day, include each and every event.

A. MARCH, 1985

TIME AND DATE	SPONSOR	LICENCE #	GROSS	PRIZES	EXPENSES

B. JULY, 1985

TIME AND DATE	SPONSOR	LICENCE #	GROSS	PRIZES	EXPENSES

Saskatchewan Commercial Bingo Inquiry
1871 Smith Street
REGINA, Saskatchewan
S4P 3V7

August 26, 1985

As you may be aware from my previous letter and the accompanying brochure, the Saskatchewan Commercial Bingo Inquiry is functioning under the authority of The Public Inquiries Act of Saskatchewan. At present, we are inviting written submissions and appearances of witnesses at public hearings. We may, at a later date, exercise the authority under The Public Inquiries Act to enforce the attendance of witnesses and to require documents and other materials to be submitted as evidence.

As an operator of a commercial bingo hall, you are in the position to have certain views and to possess certain records that are particularly relevant to the Inquiry, and I am taking this opportunity to request these from you. First, however, I would like to give you some background to the Inquiry.

It is the Commission's understanding that bingo operations across Canada and the U.S. have become a subject of controversy. Some provinces and states have made major adjustments to regulations affecting bingo and other gaming activities while in other jurisdictions, like Saskatchewan, commissions of inquiry are considering the pros and cons of a wide variety of regulations.

In Saskatchewan, since the initial licensing of commercial bingo halls in 1982, there has been a marked reduction in the percentage of the total proceeds that ends up with the sponsoring charity. The percentage paid in prizes has increased significantly and the percentage paid to hall operators as expenses has also increased during each of the past two years, according to government figures.

Some of the submissions already received by the Inquiry oppose the continued issuance of licenses to conduct bingos in commercial bingo halls. We also expect that some submissions will contain arguments that commercial bingo operations could remain profitable if the operator's proceeds were limited to 15 to 17% of gross bingo spending (as in Ontario, where total expenses are limited to 15% of total revenues). In order to consider the reasonableness or unreasonableness of such views, we are asking commercial operators to submit financial statements. Financial statements, if unaudited, should be accompanied by an affidavit sworn before a notary public or commissioner of oaths that the information provided is accurate and consistent with that filed for purposes of income taxes.

The financial statement should be used to fill in Part B of the attached questionaire, and the information in your statement and that which is listed in Part B should be clearly consistent.

Please also be advised that the Commission will keep the information in your financial statement and in Part B of the questionaire confidential if you can show good reason that such information should not be made public. The Commission will, however, use the above financial information for purposes of publishing aggregate or average financial data on commercial bingo operations in Saskatchewan.

The Commission also requests you to appear at a public hearing in a location of your choice to respond to questions in regard to all, or to Part A, of the attached questionaire. In addition, as part of your submission to the Inquiry, we would appreciate your comments on the following:

1. Why should commercial bingo halls be allowed to continue in operation?
2. Should the size of bingo halls be limited? If so, to what number of seats?
3. Should the number of bingo halls be limited in relation to the size of the community?
4. Should the days or hours of operation be limited?
5. Should the total prizes in a session be limited?
6. Should accumulating jackpots be limited? If so, how? Should accumulating jackpots be disallowed? Why or why not?
7. Is the present system of having bingos manned by the sponsoring charities working satisfactorily?
    a. Do they keep their scheduled dates?
    b. Do they provide enough workers?
    c. Do they provide capable workers?
8. Do you have enough sponsors? Do you have too many potential sponsors?

In your submission, we would also appreciate any comments you may have on issues arising from any of the terms of reference of the Inquiry, as listed in the attached brochure.

Your response should be received by the Secretary of the Commission by September 16, 1985.

Please submit information and address any questions you may have to:

Ralph F. Smith, Secretary
Saskatchewan Commercial Bingo Inquiry
1871 Smith Street
REGINA, Saskatchewan
S4P 3V7

Phone: 787-2744, collect.

I will appreciate your co-operation with the Inquiry.

Sincerely,

Norman McConnachie, Chairman

Attach (2)

QUESTIONNAIRE — COMMERCIAL BINGO HALLS

PART A

1. Name of Hall: ______________________________

2. Address and Telephone Number: ____________________

____

____

____

3. Name of owner(s): ____________________

____

Do you own or operate other bingo halls? (which ones?)

____

____

4. How long has the hall been used for bingo? __________

What was it used for before? ____________________

____

5. Is the hall a whole building? ____________________

Part of a building? ____________________

Is there a licensed beverage lounge in the building? ______

Is the hall used exclusively for bingos? __________

Specify any other uses: ____________________

____

____

____

6. Approximate floor area used for bingo: __________

7. When is bingo played?

	No./week	Prizes	Average Attendance
Evenings	______	______	______
Matinees	______	______	______
Midnight Madness	______	______	______
Other	______	______	______

Capacity (full house) ____________________

8. What were the sizes of jackpots won during the past two years, the dates upon which they were won and the number of people present for the winning event?

Jackpot Size	Date	Number Present

9. What method do you use to accumulate jackpots?

Who keeps the jackpot trust account? ______________

10. How do you calculate hall rental rates? What is included in the rent?

11. Do you supply callers to the groups?

How much are they paid and who pays them? ______________

Do you supply any other personnel? ______________

If so, what do they do? ______________

How much are they paid? ______________

12. Bingo Paper:

Where do you buy the paper? ______________________________

How much do you charge groups for paper?

____

____

13. What arrangements do you make with groups for sale of break-open tickets?

____

____

____

____

14. Do you have a standard contract between yourself and licencees? ______________ Attach a copy of your current contract and all contracts used since the start of 1984.

15. How do you determine whether or not a charity will be given access to your hall?

____

____

____

____

16. Have the groups formed a sponsor's association?

____

17. Who does the advertising? ______________________________

____

18. What are the criteria for allocating events to charities? (i.e., How does a charity get a prime night?)

____

____

____

____

____

____

19. Do you play a role or make rules concerning the way money is handled in your hall?

____

____

____

____

20. Are there rules that apply to charities and/or bingo players in your hall? ____________ (Provide a copy)

21. Provide the following information:

	January-December 1983 (12 mos.)	January-December 1984 (12 mos.)	January-June 1985 (6 mos.)
Days of bingo operation			
Number of bingo events			
Number of different sponsors			

Part B

(Financial Information - To Accompany Financial Statements)

	Jan. - Dec. 1983	Jan. - Dec. 1984	Jan. - June 1985 (6 mos)
INCOME:			
(From licencees)			
Hall Rental			
Break-open booth rental			
Caller fee			
Bingo paper			
Break-open tickets			
Advertising fees			
Other charges			
Other income (specify)			
TOTAL INCOME:			
EXPENSES OF OPERATOR:			
Rent			
Interest			
Maintenance			
Property taxes			
Telephone, Heating Electricity,			
Advertising			
Cost of caller			
Salaries: (specify job performed & list each separately)			

	Jan. - Dec. 1983	Jan. - Dec. 1984	Jan. - June 1985 (6 mos)
Cost of bingo paper			
Cost of break-open paper			
Other expenses (specify)			
Total Expenses			
NET PROFIT ON OPERATIONS (BEFORE TAX)			

On this page and the next, list information relating to bingo events during March, 1985 and July, 1985. If you have more than one event per day, include each and every event.

A. MARCH, 1985

TIME AND DATE	SPONSOR	LICENCE #	GROSS	PRIZES	EXPENSES

B. JULY, 1985

TIME AND DATE	SPONSOR	LICENCE #	GROSS	PRIZES	EXPENSES

Saskatchewan Commercial Bingo Inquiry
1871 Smith Street
Regina, Saskatchewan
S4P 3V7

October 9, 1985

Dear Sir or Madam:

As a current holder of a bingo licence, you will probably have received one or two letters previously from the Saskatchewan Commercial Bingo Inquiry. This letter is in regard to additional information that we invite you to submit, even though the public hearings are underway at this time.

It has come to our attention that, in an undetermined number of circumstances, the operators of commercial bingo halls may have attempted to influence the contents of submissions and questionnaires. We have been informed that at least one operator may have asked licencees to send submissions for initial approval by the operator before they are forwarded to the Commission. In other cases, so we are told, operators have made suggestions to clubs about the content of submissions. It seems to be the impression of certain organizations that any criticism of a bingo hall, or of existing provisions for holding bingos, will lead to that organization losing its booking in the commercial hall in question.

All such attempts to influence submissions, should they exist, would be an interference with The Public Inquiries Act of Saskatchewan. You have no obligation to first forward the submission to operators. The Commissioners would like to be informed of any such attempts to influence so that we may contemplate a recourse. Additionally, we encourage you to forward to the Commission directly any submissions not yet mailed and to revise and resubmit to the Commission any submissions that may have been completed under conditions which you feel have forced you to be less than candid.

Sincerely,

Norman McConnachie, Chairman
Saskatchewan Commercial Bingo Inquiry

SASKATCHEWAN COMMERCIAL BINGO INQUIRY

LIST OF SUBMISSIONS

S1. Saskatoon Flatwater
Racing Club
SASKATOON, Sask.

S2. Royal Canadian Legion
SWIFT CURRENT,Sask.

S3 North Battleford Co-Ed
Volleyball League Bingo
Committee
NORTH BATTLEFORD,
Sask.

S4 Saskatchewan Ski Association
SASKATOON, Saskatchewan

S7. Royal Canadian Legion
Invermay Branch No.94
INVERMAY, Sask.

S8. Royal Canadian Legion
Kamsack Branch
KAMSACK, Saskatchewan

S9 Saskatchewan Association
of Friendship Centres
REGINA, Saskatchewan

S10 Mrs. Henrietta Green
FLEMING, Saskatchewan

S11 Phillip A. Boivin
BROADVIEW, Sask.

S12 Eastend Activity Centre
EASTEND, Saskatchewan

S13 Central Canada Synod
Lutheran Church in America
WINNIPEG, Manitoba

S14 Saskatchewan Soccer
Association
SASKATOON, Saskatchewan

S15 Village of Loon Lake
LOON LAKE, Sask.

S16 Frank and Betty Pribyl
SWIFT CURRENT,Saskatchewan

S17 Foam Lake Senior
Citizens Centre, Inc.
FOAM LAKE, Sask.

S18 Macleod's Store
FORT QU'APPELLE,
Saskatchewan

S19 St. Peters Senior
Citizens Society Inc.
REGINA, Saskatchewan

S20 Kinsmen Club
DALMENY, Saskatchewan

S21 Studebaker Drivers Club
SASKATOON, Saskatchewan

S22 Town of Davidson
DAVIDSON, Saskatchewan

S23 We-Al-Go Club, Inc.
GLENAVON, Saskatchewan

S24 Estevan Pee Wee "A"
Hockey Club
ESTEVAN, Saskatchewan

S25 Gerald Go-Getters
Senior Citizens Club Inc.
GERALD, Saskatchewan

S26 Bill Desjarlais
BALCARRES, Saskatchewan

S27 Town of Wynard
WYNYARD, Saskatchewan

S28 Royal Canadian Legion
Bingo
MOOSE JAW, Saskatchewan

S29 Marquis History Book
Club
MARQUIS, Saskatchewan

S30 Silton Sunshine Club
BULYEA, Saskatchewan

S31 Lampman Prairie Lily
Club
LAMPMAN, Saskatchewan

S32 Maymont Senior Citizens
Assoc.
MAYMONT, Saskatchewan

S33 Holy Family Parish
REGINA, Saskatchewan

S34 (Lt) Don and Elizabeth
Grad
MEADOW LAKE,
Saskatchewan

S35 Lucky Lake Legion #209
Royal Canadian Legion
LUCKY LAKE, Saskatchewan

S36 Grayson Senior
Citizens Group
GRAYSON, Saskatchewan

S37 Estevan Cody's Men
Broomball Team
ESTEVAN, Saskatchewan

S38 LeRoy Seniors Club
LEROY, Saskatchewan

S39 Kidney Foundation of Canada
Saskatchewan Branch
SASKATOON, Saskatchewan

S40 St. Mary's Alter Society
FOSSTON, Saskatchewan

S41 Happy Valley Seniors
BJORKDALE, Saskatchewan

S42 Saskatoon Branch
Navy League of Canada
SASKATOON, Saskatchewan

S43 Yorkton Old Relics Hockey
Club
YORKTON, Saskatchewan

S44 Town of Foam Lake
FOAM LAKE, Saskatchewan

S45 Fifty-Five & Over Club
Incorp.
BIENFAIT, Saskatchewan

S46 Town of Leader
LEADER, Saskatchewan

S47 Village of Codette
CODETTE, Saskatchewan

S48 The Dorintook Senior Citizens
MEADOW LAKE, Saskatchewan

S49 Town of Indian Head
INDIAN HEAD, Saskatchewan

S50 P.A. Optimist Pipe Band
PRINCE ALBERT, Saskatchewan

S51 Associated Canadian Travellers
Regina Club #5 Inc.
REGINA, Saskatchewan

S52 St. Joseph's Hospital Staff
Fundraising Committee
ESTEVAN, Saskatchewan

S53 Saskatoon Zone "C" Minor Hockey Association
SASKATOON, SASKATCHEWAN

S54 Labratory Technology Students
Moose Jaw Union Hospital
MOOSE JAW, Saskatchewan

S55 Wahpeton Community Club,
PRINCE ALBERT, Sask.

S56 Yorkton SlowPitch and NAL
Ball Club Affiliate
YORKTON, Saskatchewan

S57 Estevan Cycle Blues Hockey Club
ESTEVAN, Saskatchewan

S58 Saskatchewan Racquetball and Squash
REGINA, Saskatchewan

S59 Saskatchewan Provincial Juvenile
Boy's Basketball Team
WEYBURN, Saskatchewan

S60 R.M.B.A. American League Baseball
REGINA, Saskatchewan

S61 Tele Bugs
SASKATOON, Saskatchewan

S62 Neudorf Community Hall
NEUDORF, Saskatchewan

S63 Theodore & District
Ukrainian Dance Club Inc
THEODORE, Saskatchewan

S64 Saskatoon Lancers Hockey Club
SASKATOON, Saskatchewan

S65 North Battleford
Rotary Club
NORTH BATTLEFORD, Sask.

S66 Lady Minto Union Hospital
Health
Care Home Committee
EDAM, Saskatchewan

S67 Saskatchewan Baseball
Hall of Fame
NORTH BATTLEFORD, Sask.

S68 Vanier Collegiate
MOOSE JAW, Sask.

S69 Westside Athletic Club
SASKATOON, SASKATCHEWAN

S70 Battleford's Kiwanis
Club
NORTH BATTLEFORD, Sask.

S71 North Battleford Legions
Track and Field Club
NORTH BATTLEFORD, Sask.

S72 James Smith Rehab
KINISTINO, Saskatchewan

S73 Hudson Bay Curling Club
HUDSON BAY, Saskatchewan

S74 Marshall Oddfellow &
Rebekah's Lodge
MARSHALL, Saskatchewan

S75 Lloydminster Jaycees
LLOYDMINSTER, Saskatchewan

S76 Swift Current Top Guns
Ladies Fastball Club
SWIFT CURRENT, Sask.

S77 Estevan Bears
ESTEVAN, Saskatchewan

S78 Beta Sigma Phi-Preceptor
May Chapter
SASKATOON, Saskatchewan

S79 Lestock Senior Citizens Inc.
LESTOCK, Sask.

S80 Disabled Veterans
Association
REGINA, Saskatchewan

S81 Ukrainian Greek Orthodox
Church of Holy
Transfiguration
YORKTON, Saskatchewan

S82 Minton Friendship Centre
MINTON, Saskatchewan

S83 Royal Canadian Legion
No. 60
ESTEVAN, Sask.

S84 87th Regina Scouting
Parent Group Committe
REGINA, Sask.

S85 M & S Charcoals Pee Wee "A"
Hockey Club
ESTEVAN, Saskatchewan

S86 Moose Jaw & District
Alcoholism Society Inc.
MOOSE JAW, Sask.

S87 Nipawin Antipoverty Group
NIPAWIN, Saskatchewan

S88 Zone A Hockey
Association
SASKATOON, Sask.

S89 Saskatoon Majors Fastball
Club
SASKATOON, Sask.

S90 Weyburn Minor Fastball
Association
WEYBURN, Saskatchewan

S91 Royal Canadian Legion
Branch 130
HUDSON BAY, Sask.

S92 Moose Jaw Rotary
Track Club
MOOSE JAW, Sask.

S93 Single Parents Are
Special
SASKATOON, Sask.

S94 Giants Baseball Team
REGINA, Saskatchewan

S95 Weyburn T S & M
Midget Baseball
WEYBURN, Sask.

S96 Regina Gyro Club
REGINA, Saskatchewan

S97 Estevan Old Oilers
ESTEVAN, Saskatchewan

S98 Resident Council
Extendicare
MOOSE JAW, Sask.

S99 Battlefords Agricultural
Society
NORTH BATTLEFORD, Sask.

S100 Saskatoon Dodgers
Baseball
Association Inc.
SASKATOON, Saskatchewan

S101 Rempel Bros. Fastball Club
SASKATOON, Saskatchewan

S102 Saskatoon Thunderbirds
and Cave Wildcats
Fastball Club
SASKATOON, Saskatchewan

S103 Saskatchewan Cutting Horse
Association.
SWIFT CURRENT, Sask.

S104 Moose Jaw Rangers
Fastball
MOOSE JAW, Saskatchewan

S105 Giants Sports Association
MOOSE JAW, Sask.

S106 The Family Service
Bureau of Regina
REGINA, Sask.

S107 Discovery Baptist Church
REGINA, Sask.

S108 Naicam and District
Senior Citizen
Association
Naicam, Sask.

S109 Clarke Avenue Residents
YORKTON, Saskatchewan

S110 Meadow Lake Pensioners
and Senior Citizens Org.
MEADOW LAKE, Sask.

111 Swift Current Lions
Club
SWIFT CURRENT, Sask.

S112 Weyburn "Inlander"
Slo-Pitch Club
WEYBURN, Sask.

S113 Pacific Heights Flyers
SASKATOON, Saskatchewan

S114 Order of the Royal Purple
PRINCE ALBERT, Sask.

S115 Weyburn Lake Gulf Club
WEYBURN, Sask.

S116 Country Women's Assoc.
WEYBURN, Sask.

S117 Jansen Hall Committee
JANSEN, Sask.

S118 Saskatchewan Psychiatric Nursing Assoc.
WEYBURN, Sask.

S119 Canadian Foresters
SASKATOON, Sask.

S120 Ringette Prince Albert
PRINCE ALBERT, Sask.

S121 Barry's Bombers - Ladies Fastball Club
ESTEVAN, Sask.

S122 Riverview Collegiate Student Body Council
MOOSE JAW, Sask.

S123 Timberlane Juniors
SASKATOON, Sask.

S124 Saskatoon Can Knots Old Timers Hockey Club
SASKATOON, Sask.

S125 S.J. Athletic Group
SASKATOON, Sask.

S126 Parr Potters
SASKATOON, Sask.

S126 Red Cole's Crew
SASKATOON, Sask.

S128 Weyburn Natural History Society
WEYBURN, Sask.

S129 Risk "N" Hope Wheelers Inc.
MOOSE JAW, Sask.

S130 Weyburn Red Wings Booster Club
WEYBURN, Sask.

S131 Moose Jaw Wrestling Club
MOOSE JAW, Sask.

S132 Catholic Women's League
CUMBERLAND HOUSE, Sask.

S133 Prince Albert Caledonian Society
PRINCE ALBERT, Sask.

S134 Sturgeon Lake Regional Park Authority
STURGEON LAKE, Saskatchewan

S135 Prince Albert Aero Modellers Inc.
PRINCE ALBERT, Sask.

S136 Moose Jaw Park Hotel Rusty Nuts Hockey Club
MOOSE JAW, Sask.

S137 Saskatoon Big Brothers Association
SASKATOON, Sask.

S138 Saskatoon Figure Skating Club
SASKATOON, Sask.

S139 Nipawin Pinecrest Parks
& Playgrounds
NIPAWIN, Sask.

S140 Moose Jaw B. M. X. Mac
Track
MOOSE JAW, Sask.

S141 Four Seasons
Drop-In Centre
KENOSEE LAKE, Sask.

S142 The Christian Society
Food Bank
PUNNICHY, Sask.

S143 Ladies' Auxiliary
Disabled Veterans'Assoc.
REGINA, Saskatchewan

S144 Town of St. Walburg
ST. WALBURG, Sask.

S145 City of Prince Albert
PRINCE ALBERT, Sask.

S146 St. Leo The Great
Parish Council
BUFFALO NARROWS, Sask.

S147 Battlefords Wildlife
Federation
BATTLEFORD, Sask.

S148 Theodore Minor
Sports Assoc.
THEODORE, Sask.

S149 Social Animation
Committee
REGINA, Sask.

S150 A. F. Hill
REGINA, Sask.

S150 St.Mary's R.C. Church
Bingo Committee
REGINA, Sask.

S152 Navy League of Canada
Swift Current Branch
SWIFT CURRENT, Sask.

S153 Giants Fastball Club
MOOSE JAW, Sask.

S154 P. A. Downtown
Lioness Club
PRINCE ALBERT, Sask.

S155 LaRonge Motor
Hotel Club's
LARONGE, Sask.

S156 Hamlin Community Club
NORTH BATTLEFORD, Sask.

S157 Lac Pelletier Water
Ski Club
SWIFT CURRENT, Sask.

S158 Lloydminster Senior
Citizens Society
LLOYDMINSTER, Sask.

S159 Raiders Hockey Club
REGINA, Sask.

S160 C N Oldtimers
Hockey Club
SASKATOON, Sask.

S161 CJNB Telemiracle &
CJNB Empty
Stocking Fund
NORTH BATTLEFORD, Sask.

S162 P A Skin & Scuba
PRINCE ALBERT, Sask.

S163 Nipawin Rotary
NIPAWIN, Sask.

S164 Independent Order
of Foresters
PRINCE ALBERT, Sask.

S165 Pineland Lioness Club
PRINCE ALBERT, Sask.

S166 Hazeldell Community
Club
PRINCE ALBERT, Sask.

S167 Telephone Pioneers
of America
North Battleford Club
NORTH BATTLEFORD, Sask.

S168 Holiday Park Senior
Citizens Club
SASKATOON, Sask.

S169 Foam Lake and District
Chamber of Commerce
FOAM LAKE, Sask.

S170 P.M.L. Rockettes
ESTEVAN, Sask.

S171 Saskatoon Confederation
Group Conn. Scouts,
Cubs & Beavers
SASKATOON, Sask.

S172 High Noon Optimist
Club of Regina
REGINA, Sask.

S173 Bingo Palace
MEADOW LAKE, Sask.

S174 Weyburn Outlaw
Recreational
Hockey Club
WEYBURN, Sask.

S175 CWC Maulers
MOOSE JAW, Sask.

S176 Brokenshell Horse Club
TROSSACHS,Sask.

S177 Yorkton Parkland
Synchronized Swim Club
YORKTON, Sask.

S178 Moose Jaw YM/YWCA
Competitive Gymnastics
MOOSE JAW, Sask.

S179 Department of Consumer
and Commercial Affairs
REGINA, Sask.

S180 Regina Lions Bingo
Centre
REGINA, Sask.

S181 Prince Albert
Lions Club

PRINCE ALBERT, Sask.

S182 Regina-South Sask.
Humane Society
Incorporated
REGINA, Sask.

S183 Mistatim Golden
Rods Society
MISTATIM, Sask.

S184 Strasbourg and Community
STRASBOURG, Sask.

S185 Drake & District
Recreation Board
DRAKE, Sask.

S186 Al-Wa Shrine Club
Lloydminster
LLOYDMINSTER, Sask.

S187 Estevan Golden
Hawks Fastball Club
ESTEVAN, Sask.

S188 Chappell Section
Sports Incorporated
SASKATOON, Sask.

S189 Estevan Strippers
Oldtimers
ESTEVAN, Sask.

S190 Estevan Viking
Old Stockers
ESTEVAN, Sask.

S191 Saskatoon Fairhaven
Flyers Hockey Club
SASKATOON, Sask.

S192 Marshall & District
Lions Club
MARSHALL, Sask.

S193 Prince Albert
Lioness Club
PRINCE ALBERT, Sask.

S194 Saskatoon Thunderbirds
Junior Fastball Club
SASKATOON, Sask.

S195 Army, Navy Airforce
in Canada
Unit 18 Incorporated
REGINA, Sask.

S196 Knights of Columbus
Father Lawless
Council, No. 1534
MOOSE JAW, Sask.

S197 Kikinak Friendship
Centre
LA RONGE, Sask.

S198 Jaguar Gym and
Fitness Club
MEADOW LAKE, Sask.

S199 Saskatoon Sons
of Norway
SASKATOON, Sask.

S200 Saskatchewan Amateur
Wrestling Association
REGINA, Sask.

S201 Associated Canadian
Travellers
NORTH BATTLEFORD, Sask.

S202 CFB Moose Jaw
Dundurn Detachment
Community Council
MOOSE JAW, Sask.

S203 St.George's Ukranian
Catholic Cathedral
SASKATOON, Sask.

S204 Delisle Composite
School & Yearbook #661
SASKATOON, Sask.

S205 Saskatoon Chapter
of Canadian Foundation
for Ileitis & Colitis
SASKATOON, Sask.

S206 Sask. Gymnastics
Association
REGINA,Sask.

S207 Hanley Order of the
Royal Purple # 72
HANLEY, Sask.

S208 Regina Riding & Driving
Club Incorporated
REGINA, Sask.

S209 West Central
Communmity Club
PRINCE ALBERT, Sask.

S210 Quota Club of Weyburn
WEYBURN, Sask.

S211 Churchbridge Ladies
Curling Club
CHURCHBRIDGE, Sask.

S212 Swift Current Blues
Hockey Club
SWIFT CURRENT, Sask.

S213 Prince Albert
United Way
PRINCE ALBERT. Sask.

S214 Saskatoon Nordic Ski
Club-Disabled Skiers
SASKATOON, Sask.

S215 Sask Voice of the
Handicapped
NORTH BATTLEFORD, Sask.

S216 P.A. Sports Council Inc.
PRINCE ALBERT, Sask.

S217 White Star Community
Centre
PRINCE ALBERT, Sask.

S218 Swift Current Band
Parents Auxiliary
SWIFT CURRENT, Sask.

S219 Moose Jaw Park Plugs
MOOSE JAW, Sask.

S221 Swift Current Kiwanis
Synchro Club
SWIFT CURRENT, Sask.

S220 Eureka Fellowship Society
REGINA, Sask.

S222 Regina Lions Junior
Band
REGINA, Sask.

S223 R.T.S. Hockey Club
Wings(oldtimers)
REGINA, Sask.

S224 Moose Jaw Masonic
Building Corp.
MOOSE JAW, Sask.

S225 Associated Canadian
Travellers
YORKTON, Sask.

S226 Royal Canadian Legion
Ladies Auxiliary
BIENFAIT, Sask.

S227 Crystal Springs Happy
Gang Inc.
CRYSTAL SPRINGS, Sask.

S228 Calder Comets Ball Club
CALDER, Sask.

S229 Meota Lakeshore Lions
Club
MEATO, Sask.

S230 Kinsmen Club of
Saskatoon
SASKATOON, Sask.

S231 N. Battleford Junior
Host Committee
NORTH BATTLEFORD, Sask.

S232 North Battleford
Junior Beavers
NORTH BATTLEFORD, Sask.

S233 St. Peter's Men's Club
REGINA, Sask.

S234 Canadian Polish
Congress (Sask.)District
PRINCE ALBERT, Sask.

S235 Friends of Saskatchewan
Children
PRINCE ALBERT, Sask.

S236 Order of the Royal
Purple
HAWARDEN, Sask.

S237 Kiwnais Club of
Moose Jaw
MOOSE JAW, Sask.

S238 Weyburn Group Homes
Society Inc.
WEYBURN, Sask.

S239 Nipawin Botterill's
Pacers
NIPAWIN, Sask.

S240 Order of the Royal
Purple
NIPAWIN, Sask.

S241 Prince Albert
Pineland Lions
PRINCE ALBERT, Sask.

S242 Optimist Gymnastics
of Regina
REGINA, Sask.

S243 Royal Life Saving
Society Canada,
Sask. Branch
REGINA, Sask.

S244 Association of
United Ukrainian
Canadians
REGINA, Sask.

S245 Melville Millionaires
Junior A Hockey Club
MELVILLE, Sask.

S246 Royal Canadian
Legion Ladies Auxiliary
REGINA, Sask.

S247 Esterhazy Golden
Jets Inc.
ESTERHAZY, Sask.

S248 St. Basil's Parish
REGINA, Sask.

S249 Sonia's School of
Ukrainian Dance Inc.
REGINA, Sask.

S250 Weyburn Kinsmen Club
WEYBURN, Sask.

S251 Prince Albert Tamarack
Foundation
PRINCE ALBERT, Sask.

S252 Moose Jaw Senior Ladies
BroomBall League
MOOSE JAW, Sask.

S253 Marcelin Assoc. of
Metis & Nonstatus
Indians(Local #113)
MARCELIN, Sask.

S254 Royal Canadian Legion
Branch 002
PRINCE ALBERT, Sask.

S255 Peacock High School
Basketball
MOOSE JAW, Sask.

S256 Little Rascals Co-
operative Play Centre
WEYBURN, Sask.

S257 Pasqua Community Club
MOOSE JAW, Sask.

S258 Moose Jaw Kiwanis Speed
Skating Club
MOOSE JAW, Sask.

S259 B.P.O. Elks Lodge
#12 Bingo Committee
SASKATOON, Sask.

S260 Regina Telephone
Pioneers
(Prairie Council)
REGINA, Sask.

S261 Saskatoon Foster Care
Association
SASKATOON, Sask.

S262 Saskatoon Firefighters
Oldtimers Hockey Club
SASKATOON, Sask.

S263 Hudson Bay Park
Community Association
SASKATOON, Sask.

S264 Swift Current Indian
Booster Club
SWIFT CURRENT, Sask.

S265 Saskatchewan Media Softball
Club
REGINA, Sask.

S266 The Saskatchewan
Hemophilia Society
SASKATOON, Sask.

S267 Regina Five Pin
Bowling Assoc.
REGINA, Sask.

S268 Sask. Tennis Association
SASKATOON, Sask.

S269 Regina German Cultural
Society
REGINA, Sask.

S270 Victoria East Community
Foundation Inc.
REGINA, Sask.

S271 Regina Boxing Club
REGINA, Sask.

S272 Regina Senators
Basekball Organization
REGINA, Sask.

S273 Sundown Optimist Club
Club
REGINA, Sask.

S274 Frank Buck Fastball
Club
REGINA, Sask.

S275 Taiso Gymnastics Club
Inc.
SASKATOON, Sask.

S276 Saskatoon Chapter
Sclerosis Society
SASKATOON, Sask.

S277 Saskatoon Branch-Mental
Health Association in Sask.
SASKATOON, Sask.

S278 Moose Jaw Mallard's
MOOSE JAW, Sask.

S279 White Hackle Optimist
Pipe Band
MOOSE JAW, Sask.

S280 B+L Warriors
Fastball Team
SWIFT CURRENT, Sask.

S281 Regina Canadian Junior
10 Pin Bowling Association
REGINA, Sask.

S282 Willow Heights Co-op
Community Centre
NORTH BATTLEFORD,Sask.

S283 B.P.O.Elks #171
LLOYDMINSTER, Sask.

S284 Aeroflips Trampoline
Club Saskatoon
SASKATOON, Sask.

S285 Young Women's
Christian Association
REGINA,Sask.

S286 Shellbrook Minor Sports
SHELLBROOK, Sask.

S287 Beta Sigma Phi XiXi
WEYBURN, Sask.

S288 Saskatoon Coffee
Breakers
SASKATOON, Sask.

S289 Wymark Ladies Action
Group
WYMARK, Sask.

S290 Lloydminster Amateur
Boxing Club
LLOYDMINSTER, Sask.

S291 St. Josaphat Home &
School Association
REGINA, Sask.

S292 Bienfait Coalers Hockey
Club
BIENFAIT, Sask.

S293 Seniors Transportation
Program
PRINCE ALBERT,Sask.

S294 P.A. Couple Club Inc.
PRINCE ALBERT, Sask.

S295 Prince Albert Downtown
Lioness
PRINCE ALBERT, Sask.

S296 Wroxton & District
Recreation
Board
WROXTON, Sask.

S297 Yorkton Miller Hockey
Club
YORKTON, Sask.

S298 Rotary Club of Yorkton
YORKTON, Sask.

S299 Prairie Gold Chapter,
Sweet Adolines, Inc.
REGINA, Sask.

S300 CKRM Good Neighbour Fund
REGINA,Sask.

S301 Regina Central Lions
Club
REGINA, Sask.

S302 St. Cecilia Men's Club
REGINA, Sask.

S303 #34 Sabre Squadron
Royal Canadian Air
Cadets
REGINA, Sask.

S304 Saskatoon Debra-Dees
Softball
SASKAKTOON, Sask.

S305 St. Joseph's Parish &
Knights of Columbus
SASKATOON, Sask.

S306 Saskatoon Junior Jazz
SASKATOON, Sask.

S307 Hudson Bay Ukrainain
Catholic Men's Club
HUDSON BAY, Sask.

S308 Brent Willis
1753 Thompson Ave.
SASKATOON, Sask.

S309 The Diocese of Saskatchewan
PRINCE ALBERT, Sask.

S310 Weyburn Bingo Committee
WEYBURN, Sask.

S311 Saskatchewan Shuffleboard
Association
REGINA, Sask.

S312 Lakeside Lions Club
REGINA, Sask.

S313 Wheatland Chorus
REGINA, Sask.

S314 Moose Jaw Hockey Society
MOOSE JAW, Sask.

S315 Yorkton Jr. Hockey
Booster Club
YORKTON, Sask.

S316 The Navy League of
Canada
Saskatoon Branch
SASKATOON, Sask.

S317 Saskatoon Alpine
Racing Team
SASKATOON, Sask.

S318 Empire Rebekah Lodge
No.43
REGINA, Sask.

S319 R&W Youth Club
REGINA, Sask.

S320 Regina Veterans Council
REGINA,Sask.

S321 Maple Leaf Lions Club
REGINA, Sask.

S322 Regina Elks #9
REGINA, Sask.

S323 Lloydminster Children's
Daycare Society
LLOYDMINSTER, Sask.

S324 The Royal Canadian
Legion
Lintlaw Sask. Branch 23
LINTLAW, Sask.

S325 Parkland Lions
YORKTON, Sask.

S326 Battlefords Indian & Metis Friendship Centre
NORTH BATTLEFORD, Sask.

S327 Regina Community Bingo Inc.
REGINA, Sask.

S328 Bazaar and Novelty
REGINA, Sask.

S329 Meadow Lake Ministerial Association
MEADOW LAKE, Sask.

S330 Yorkton Society for the Prevention of Cruelty to Animals
YORKTON, Sask.

S331 Circle Drive Alliance Church
SASKATOON, Sask.

S332 Tavria Ukrainian Folk Dance Ensemble
REGINA, Sask.

S333 Ukrainian Society of Prosvita
REGINA, Sask.

S334 Cave Wildcats Ladies Softball Club
SASKATOON, Sask.

S335 B84-1431-CA
SASKATOON, Sask.

S336 Cut Knife Recreation Board
CUT KNIFE, Sask.

S337 Knox Metropolitan Congregation
REGINA, Sask.

S338 Jedburgh & District Recreation Board
JEDBURGH, Sask.

S339 Queen City Kinsmen Gymnastics and Dance Club
REGINA, Sask.

S340 Kinsmen Club of La Ronge
LA RONGE, Sask.

S341 Nisse Lodge 4-567 Sons of Norway
NORTH BATTLEFORD, Sask.

S342 Lampman Ladies Curling Club
LAMPMAN, Sask.

S343 Navy League of Canada Regina Branch
REGINA, Sask.

S344 Canadian Hostelling Association
REGINA, Sask.

S345 Weyburn Silver Seals Swim Club
WEYBURN, Sask.

S346 Harold & Berni Gelinas
RADISSON, Sask.

S347 Beatty and District Rink Association
BEATTY, Sask.

S348 North Battleford Bingo Associaton, Inc.
NORTH BATTLEFORD, Sask.

S349 Hospitals of Regina,
REGINA, Sask.

S350 P.A. Branch of the Navy
League of Canada
PRINCE ALBERT, Sask.

S351 Saskatchewan Senior's
Association, Inc.
KINDERSLEY, Sask.

S352 Regina Police Pistol
Club
REGINA, SASK.

S353 Pope John Paul I
Council Knights of
Columbus
NIPAWIN, Sask.

S354 Kinsmen Club of Nipawin
NIPAWIN, Sask.

S355 Battleford's Wheelchair
Sports
NORTH BATTLEFORD, Sask.

S356 Moose Jaw Generals
Senior Hockey Club
MOOSE JAW, Sask.

S357 YWCA Saskatoon
SASKATOON, Sask.

S358 St. Mary's Church
SASKATOON, Sask.

S359 Saskatoon Women's Field
Lacrosse Association
SASKATOON, Sask.

S360 Estevan Figure Skating
Club
ESTEVAN, Sask.

S361 Estevan Cody Raiders
Men's Broomball
ESTEVAN, Sask.

S362 MacDowall & District
Lioness Club
MACDOWALL, Sask.

S363 Knights of Columbus
HUDSON BAY, Sask.

S364 Royal Canadian Legion
#61
MELVILLE, Sask.

S365 Swift Current
Tennis Club
SWIFT CURRENT, Sask.

S366 Novakoski Flames
Hockey Club
SASKATOON, Sask.

S367 Regina Multiple
Sclerosis Society of
Canada
REGINA, Sask.

S368 Warman Figure Skating
Club
WARMAN Sask.

S369 Saskatoon Lions
Speedskating Club
SASKATOON, Sask.

S370 Lions Club of
Lloydminsters
LlOYDMINSTER, Sask.

S371 Glaslyn & District
Recreation Board
GLASLYN, Sask.

S372 Paradise Hill Recreation
Board
PARADISE HILL, Sask.

S373 Bienfait Figure
Skating Club
BIENFAIT, Sask.

S374 Pennant Lions Club
PENNANT,Sask.

375 Edam & District Recreation Board
EDAM, Sask.

S376 Saskatoon Orioles Baseball Association
SASKATOON, Sask.

S377 Saskatchewan Canoe Assoc.
SASKATOON, Sask.

S378 Criminal Intelligence Service
SASKATOON, Sask.

S379 Army and Navy Airforce Veterans
SASKATOON, Sask.

S380 Elks Lodge
MEADOW LAKE, Sask.

S381 Northern Village of Green Lake
GREEN LAKE, Sask.

S382 North Battleford City Kinsmen Band Association
NORTH BATTLEFORD, Sask.

S383 Invermay Golden Age Club
INVERMAY, Sask.

S384 North Weyburn Women's Institute
WEYBURN, Sask.

S385 Weyburn 5 Pin Bowling Association
WEYBURN, Sask.

S386 Weyburn Branch Sask. Genealogical Society
WEYBURN, Sask.

S387 Souris Valley Antique Association
WEYBURN, Sask.

S388 Saskatchewan Cycling Association
SASKATOON, Sask.

S389 Saskatchewan Soccer Association
SASKATOON, Sask.

S390 Regina WaWa Shrine Drum Corps.
REGINA, Sask.

S391 King's Tire Ball Club
SASKATOON, Sask.

S392 Army, Navy and Air Force Veterans
REGINA, Sask.

S393 Sask. Badminton Assoc.
SASKATOON, Sask.

S394 Town of Unity
UNITY, Sask.

S395 Cando Recreation Board
CANDO, Sask.

S396 Saskatoon Girls Athletic & Culture Club
SASKATOON, Sask.

S397 Estevan Birch Wildlife Association
ESTEVAN, Sask.

S398 Army, Navy and Air force Ladies Aux. # 1103
YORKTON, Sask.

399 Episcopal Corp of Sask.
Saskatoon
SASKATOON, Sask.

S400 Saskatoon Midget Royals
SASKATOON, Sask.

S401 Regina Saskatchewan Amateur
Football Inc.
REGINA, Sask.

S402 Regina Y's Mens Marlin
Swim Club
REGINA, Sask.

S403 Victoria Park Pipe Band
Inc.
REGINA, Sask.

S404 Saskatoon Chapter Knight
of Columbus
SASKATOON, Sask.

S405 St. Mary's Parish
Ukrainian Catholic
Cultural Centre
YORKTON, Sask.

S406 Drinkwater Mens Fastball
MOOSE JAW, Sask.

S407 Beechy Lodge Elks
BEECHY, Sask.

S408 Pensioners & Pioneers
Organization
SASKATOON, Sask.

S409 Regina Big Brothers
REGINA, Sask.

S410 Teenline
SASKATOON, Sask.

S411 Sask. Ladies Curling
Association
SASKATOON, Sask.

S412 Kinsmen Club of
Saskatoon
POW CITY
SASKATOON, Sask.

S413 Sasktoon Wrestling Club
SASKATOON, Sask.

S414 Royal Canadian Legion
#28
HUMBOLDT, Sask.

S415 Buddys Regina Reds
REGINA, Sask.

S416 Saskatchewan Canoe
Association
SASKATOON, Sask.

S417 Beta Sigma Phi XiXi
Chapter
WEYBURN, Sask.

S418 Volunteer Centre
PRINCE ALBERT, Sask.

S419 Qu'Appelle Indian
Residential School
LEBRET, Sask.

S420 Blanche E. Pott
SHELL LAKE, Sask.

421 City of Melville
MELVILLE, Sask.

S422 Aquatic Sports
NORTH BATTLEFORD, Sask.

S423 Yorkton B.P.O. Elks #392
YORKTON, Sask.

S424 Kinsmen Club of North
Battleford
BATTLEFORD, Sask.

425 Saskatoon Nippers Boys Club
SASKATOON, Sask.

S426 Midwinter Ladies Curling Club
SASKATOON, Sask.

S427 Zone West Tier I Tweens (Ringette)
SASKATOON, Sask.

S428 Stein Electric Royals Baseball Club
SASKATOON, Sask.

S429 Molson Oldtimer Hockey Club
SASKATOON, Sask.

S430 Yorkton Venice House All-Starettes
YORKTON, Sask.

S431 St. Louis Lions Club
ST. LOUIS, Sask.

S432 Battlefords Sailing Club
NORTH BATTLEFORD, Sask.

S433 Ukrainian Greek-Orthodox Auditorium
REGINA, Sask.

S434 Swift Current Kinsmen Club
SWIFT CURRENT, Sask.

S435 Weyburn Child Care Co-operative
WEYBURN, Sask.

S436 Nipawin Junior Hawks
NIPAWIN, Sask.

S437 Regina Raiders
REGINA, Sask.

S438 Prince Albert Gymnastics Club
PRINCE ALBERT, Sask.

S439 Lebret Mission Social Club
LEBRET, Sask.

S440 Prince Albert Suntep Student Travel
PRINCE ALBERT, Sask.

S441 National School of Dental Therapy-Students
PRINCE ALBERT, Sask.

S442 Glacier Ski Club
SASKATOON, Sask.

S443 Rush Lake & Community Recreation Board
RUSH LAKE, Sask.

S444 Estevan & District Pro-Life Association
ESTEVAN, Sask.

S445 Saskatoon Indian & Metis Friendship Centre
SASKATOON, Sask.

S446 Saskatchewan Native Promotions
SASKATOON, Sask.

S447 Central Regina Early Learning Centre
REGINA, Sask.

S448 Shig Kubota
REGINA, Sask.

S449 Midale Civic Centre
MIDALE, Sask.

S450 Saskatoon Native Warriors
SASKATOON, Sask.

S451 Town of La Ronge
LA RONGE, Sask.

S452 City of Regina
REGINA, Sask.

S453 Weyburn Stanlee
Stingers
WEYBURN, Sask.

S454 Saskatoon Wrestling Club
SASKATOON, Sask.

S455 Regina Lions Ringette Team
REGINA, Sask.

S456 Bar K Konnection:
Ladies Broomball Club
SASKATOON, Sask.

S457 Saskatchewan Garden & Food
Project Inc.
GRANDORA, Sask.

S458 YMCA Laser Swim Club
SASKATOON, Sask.

S459 Village of Wishart
WISHART, Sask.

S460 Regina Boxing Club
REGINA, Sask.

S461 Central Canada Synod
Lutheran Church in America
WINNIPEG, Manitoba

S462 Hudson Bay Arm Wrestling
HUDSON BAY, Sask.

S463 Village of Glaslyn
GLASLYN, Sask.

S464 Centennial Market Mall
Merchants' Association
REGINA, Sask.

S465 The Saskatchewan Urban
Municipalities Association
REGINA, Sask.

S466 P & M Athletic Group
SASKATOON,Sask.

S467 Regina Victoria Chapter
I.O.D.E.
REGINA, Sask.

S468 Estevan Kinsmen Club
ESTEVAN, Sask.

S469 Saskatoon Bentsticks
Oldtimers (Hockey)
SASKATOON, Sask.

S470 Memorial Field Fastball
Trophy World Twisters
WINNIPEG, Manitoba

S471 City of Saskatoon
SASKATOON, Sask.

S472 Moose Jaw Downtown Bingo
Association
MOOSE JAW, Sask.

S473 Prince Albert Optimist Club
PRINCE ALBERT,Sask.

S474 Terry D. Tolly
PRINCE ALBERT,Sask.

S475 Herman Crain
BIRCH HILLS, Sask.

S476 Concerned Bingo Players
MOOSE JAW, Sask.

477 Ukrainian Self-Reliance
Association of Saskatoon
SASKATOON, Sask.

S478 St. Paul's United
Church of Canada
SASKATOON, Sask.

S479 G. Kerry Moffat
SASKATOON, Sask.

S480 B.P.O. Elks of Canada
SWIFT CURRENT, Sask.

S481 General Alexander Ross
Br. #77 Royal Canadian Legion
YORKTON, Sask.

S482 Saskatoon North Stars
Hockey Club
SASKATOON, Sask.

S483 Church of Society Committee
United Church of Canada
BALCARRES,Sask.

S484 Security Game
Manufacturers Ltd.
REGINA, Sask.

S485 Doug Fernets
SASKATOON, Sask.

S486 Saskatoon Rowing Club
SASKATOON, Sask.

S487 Westside Bowling League
SASKATOON, Sask.

S488 St. John Bosco Men's
Club
SASKATOON, Sask.

S489 Veterans Organization

S490 Yorkton Volleyball Club
YORKTON, Sask.

S491 Optimist Club of Regina
REGINA, Sask.

S492 Marcella Marin
SASKATOON, Sask.

S493 Saskatoon Bingo's
Confederation Park Bingo
SASKATOON, Sask.

S494 Lampman & District
Lions Club
LAMPMAN, Sask.

S495 Peter Matthews
SASKATOON, Sask.

S496 Pensioners & Senior
Citizens Orgqanization
WADENA, Sask.

S497 Juvenile Diabetes
Foundation
REGINA, Sask.

S498 Lemberg Lions Club
LEMBERG, Sask.

S499 Alvena Bingo Committee
ALVENA, Sask.

S500 Legion Bingo
BATTLEFORD, Sask.

S501 Sister Ann Rosario
NORTH BATTLEFORD, Sask.

S502 Harvey G. Walker,
NORTH BATTLEFORD, Sask.

S503 Fred Harshman
REGINA, Sask.

S504 Jeannine Bouvier
SASKATOON, Sask.

S505 Roy M. Mickelson
YORKTON, SASK.

S506 The Battlefords
Ministerial Association
Battleford, Sask.

S507 Saskatchewan Horse Racing
Association
REGINA, Sask.

S508 Regina Better Health
Association
REGINA, Sask.

S509 Regina Molson Football Club
REGINA, Sask.

S510 Moose Jaw & District
Development Centre
MOOSE JAW, Sask.

S511 Yorkton Figure Skating Club
YORKTON, Sask.

S512 Saskatoon Creative
Playschool
SASKATOON, Sask.

S513 The Prince Albert Aero
Modellers Inc.
PRINCE ALBERT, Sask.

H List Bingo Halls Commercial and Non Commercial

H1	Weyburn Community Bingo	Commercial
H2	Estevan Community Bingo	Commercial
H3	Moose Jaw Community Bingo	Commercial
H4	Queen City Bingo, Regina	Commercial
H5	La Ronge Bingo Castle	Commercial
H6	Prince Albert Bingo	Commercial
H7	Christopher Columbus Club Three C's, Regina	Commercial
H8	North Battleford Bingo Palace	Commercial
H9	Centennial Bingo, Regina	Commercial
H10	Lakeview Hall, Meadow Lake	Commercial
H11	P.K. Bingo Palace, Yorkton	Commercial
H12	Regina Bingo Palace	Commercial
H13	Regina Turvey Centre	Non-Commercial
H14	Fort Qu'Appelle Dreamland Bingo Palace	Commercial
H15	Regina Lions Bingo Centre	Non-Commercial
H16	Saskatoon Luch Horseshoe Bingo	Non-Commercial
H17	Yorkton Parkland Bingo Palace	Commercial
H18	Prince Albert Club Bingo Inc.	Non-Commercial
H19	Moose Jaw City Bingo Center	Commercial
H20	Saskatoon Manhattan Bingo, Inc.	Commercial
H21	Regina Community Bingo, Inc.	Non-Commercial
H22	Saskatoon Bingo Palace	Commercial

H23	Diamond Bingo, Saskatoon	Commercial
H24	Community Bingo Lloydminster	Non-Commercial
H25	Saskatoon Silver Dollar Bingo (SINCO Social Centre)	Non-Commercial
H26	Evergreen Centre Inc., Nipawin	Non-Commercial
H27	Lloydminster Bingo and Nevada Associations	Non-Commercial
H28	Swift Bingo, Swift Current	Commercial
H29	Bridge City Bingo, Saskatoon	Commercial
H30	Confederation Bingo, Saskatoon	Commercial
H312	Saskatoon World Bingo	Commercial
H33	Challenger Bingo, Regina	Commercial

Prince Albert: Tuesday, October 8, 1985

2pm

1. Robert Stebanuk, P.A. Bingo
2. Mr. Mason, Evergreen Centre, Nipawin
3. Mr. Schneider and Mr. Leibel, Club Bingo Inc.
4. Joanne McCammon
5. Don Holzer
6. Mr. Zatlyn
7. Mr. Schass

7pm

8. Jim Wilm, Prince Albert Lions Club
9. Glen Cochrane, P.A. Couple Club Inc.
10. Doris Lund, Alderman for the City of Prince Albert
11. Marvis Wilm, Prince Albert Lioness Club
12. Robert Pilon, P.A. Sports Council Inc.
13. Mary Sarrazin, White Star Community Centre
14. Father John Wagland, Anglican Church of Canada
15. E. Hirsch, Beatty and District Rink Association
16. Michael Dougherty
17. Mal Gerow, Shellbrook Minor Sports
18. Mr. Prokofe

La Ronge: Thursday, October 10, 1985

2pm

19. Mayor Mel Hegland, Town of La Ronge
20. Darwin Banach, La Ronge Bingo Castle
21. Joanne Crofford, Kikinak Friendship Centre
22. Father John Wagland
23. Bill Ryhorchuk
24. Ms. Allen-Tuaald

7pm

25. Reverned Larry Fry, Lutheran Church
26. Marshal Leswick, Kinsmen Club of La Ronge

27. Howard Lucas, La Ronge Indian Band
28. Alan Quandt, Royal Canadian Legion #374
29. Marg Houghton
30. Judy Tomuek

Meadow Lake: Tuesday, October 15, 1985

2pm

31. Don Demkiw, Lakeview Hall (Northern Entertainment Centre)
32. Ron Clark, Meadow lake Ministerial Association
33. Mayor R. Bishop, of the Village of Green Lake
34. Mr. Lutz
35. Terry Lamon, Meadow Lake Golf Course

7pm

36. Mayor Dave Bridger, Town of Meadow Lake
37. Don Grad
38. John Million, Meadow Lake Pensioners and Senior Citizens
39. Mr. Zacharis
40. Lawrence Landry, Elks Lodge
41. Mr. Hegseth
42. Lloyd Elash
43. Tammy Handley

North Battleford: Wednesday, October 16, 1985

2pm

44. Mel Graham and Robin Riseing, Saskatchewan Voice of the Handicapped
45. Alex McDougall and Barry Florence, North Battleford Bingo Palace
46. Mrs. C. Wyma, North Battleford Senior Citizens Action Now
47. Reverend Bob Bryce, The Battlefords Ministerial Association
48. Reverend Jack Carr, 3rd Ave United Church
49. Nelse Soiseth, Sons of Norway
50. Steve Grzybowski, Hafford Recreation Board

7pm

51. Peter Van Dyjk, Battlefords Wildlife Federation
52. Shirley Smith, Battlefords Indian and Metis Friendship Centre
53. Dave Shury, North Battleford Bingo Association
54. Dr. Antonson and Mr. Chapion, Cut Knife Recreation Board
55. Ken Holiday and Lorna McLean, North Battlefords Kinsmen Band Association
56. Dick Robin
57. Mr and Mrs. Holiday, Royal Canadian Legion Association
58. Tom Schwab, Knights of Columbus, Town of Battleford
59. Greg Rose, Battlefords Boys and Girls Club

Lloydminster: Thursday, October 17, 1985

2pm

60. Don Newlin and James Hammermeister, the City of Lloydminster
61. Ken Sawtell and Lawrence Tripp, Bingo and Nevada Association
62. Dave Ross and Rosanne Ross, A.M.N.S.I.S. Local #18 Bingo Hall
63. Beatrice Major and Dave Ross, Lloydminster Metis Society

7pm

64. Evert Poor and Pat Edgar, Lloydminster Children's Daycare Society
65. Ray Tatro, Border City Lions Club
66. Burt Lafoy, Lloydminster Legion
67. Grant Nicholas

Yorkton: Monday, October 21, 1985

2pm

68. Sam Koch, P.K. Bingo Palace
69. John Sereda, Town of Foam Lake
70. Judy Solomon

71. Mr. Malyans
72. Mr. Sideler, Yorkton Friendship Centre
73. Mrs. Kaye
74. Representative for the Melville Knights of Columbus
75. Larry Renton, Yorkton Slowpitch and NAL Ball Club Affiliate
76. E. Iluk, Melville Millionaries
77. Mr. Kyba and Mr. Kobylka, St. Mary's Parish: Ukrainian Catholic Cultural Centre
78. Parkland Bingo Palace, Don Werner
79. Bernard Rink, Royal Canadian Legion: Kamsack Branch
80. Gene Krepakevich, Yorkton Jr. Hockey Booster Club
81. S. Boyd and Delores Holstein, Clarke Ave Residents
82. Diane Frederickson and Darlene Fleming, Theodore Minor Sports Association
83. D. Acheson, Parkland Lions Club
84. Jack MacKay, Yorkton Society for the Prevention of Cruelty to Animals
86. W. Kock, Yorkton Volleyball Club
87. R. Heppurn

Weyburn: Tuesday, October 20, 1985

2pm

88. Gordon Miles, Mayor of the City of Weyburn
89. Charles Travis and Michael Samenook, Weyburn and Estevan Community Bingo
90. Tom Webb
91. Florence Smart, Fifty-five and Over Club Inc.
92. Burt Shipman, Canadian Forester Jackpot Bingo
93. C. Travis
94. Mrs. N. Mack, Halbrite Social Club.
95. Jim Muldoon, Independent Order of Oddfellows
96. Harold Vileu, Vileu's Karate Club

7pm

97. Connie Roy, Estevan Pro-life
98. H.E. Kew, Weyburn Bingo Committee
99. Al Wayman
100. Ed Dirks, Royal Canadian Legion
101. Larry Balog, Weyburn Minor Football Assosciation
102. Carol Hutchings, Weyburn Silver Seals Swim Club
103. Beryl Keefs, North Weyburn Women's Institute
104. Reverend Phyllis Dietrich, United Church
105. Loretta Moffat, Weyburn 5 Pin Bowling Association

106. John Ruckaber
107. Unidentified Individual

Moose Jaw: Wednesday, October 23, 1985

2pm

108. Don Holzer, Moose Jaw Community Bingo
109. Alma Bute and Andy Sohol, Moose Jaw Bingo Centre
110. Stan Ingleby, Royal Canadian Legion Bingo

7pm

111. Gene Curtis, Downtown Bingo Association
112. A.R. Shepherd, Giants Sports Association
113. Gene Chura, Knights of Columbus
114. Rod Clark, Giants Fastball Club
115. Dave Tebb, Moose Jaw Park Plugs
116. Murray Smail, Moose Jaw Hockey Society
117. Wally Boshuck, Moose Jaw Speed Skating Club
118. Bob Hobbes, Director of the Union Centre
119. C. Haug, Moose Jaw Kinsmen's Flying Fins
110. Ms. Heron, Oddfellows and Rebeccas
111. Ms. Ropertz
112. Mr. Dorward

Swift Current: Thursday, October 24, 1985

2pm

113. Roger Wallis and Joane McCammon, Swift Bingo
114. Mr. Gatz, Royal Canadian Legion
115. James Parson, Swift Current Band Parents Auxiliary

7pm

116. Doug Vance, Saskatchewan Cutting Horse Association
117. Donald Kierslake, Navy League of Canada
118. Mr. Meyers, Swift Current Kiwanis Synchro Club
119. B. Boatin and G. Herrler
120. Dave Anderson, Swift Current Kinsmen Club
121. Jim Cannon

Saskatoon: Tuesday, October 29, 1985

2pm

122. Jim Hughston and Stan Walt, Saskatoon Bingo Palace and Diamond Bingo
123. Leo Omani and George Burghall, Silver Dollar Bingo
124. Dennis Adkin, Saskatchewan Ski Association
125. Alice Oatway

7pm

126. Gerry Adams and James Gash, Saskatoon Thunderbirds and Cave Wildcats Fastball Club
127. Linda Slough, Goldfin Swim Club
128. Harry Groin, St. John Bosco Society Men's Club
129. Grant Cheston, Saskatchewan Canoe Association
130. Orest Basiove
131. William Slough

Wednesday: October 30, 1985

2pm

132. Sgt. John Quinn, Saskatoon City Police
133. Daniel Shapiro, Army, Navy and Air Force Veterans
134. Harvey Smith, Confederation Bingo
135. Ed Benesh and F. Sullivan, Lucky Horseshoe Bingo: Knights of Columbus

7pm

136. Peter Borus, Saskatoon Help the Handicapped
137. Mr. Koester, Pensioners and Pioneers Organization
138. Bruce Murray, Westside Bowling Leaque and Bandits Fastball Club
139. Allen Olson, Zone A Hockey Association and Majors Fastball Club
140. Mr. D. Knott, Saskatchewan Soccer Association
141. Murdock MacFarlane, Circle Drive Alliance Church
142. Reverend Al Jones, St. Paul's United Church
143. Bishop Luetkehoelter, Lutheran Church in America
144. Doug Higgins, Bar K Konnection : Ladies Broomball Club

Thursday: October 31, 1985

2pm

145. Peter Bezbes, Bob MacKenzie, Gerry Stadnyk and Tom Karas, World Bingo
146. John Atamanenko and E. Bartklo, Bridge City Bingo
147. Don Martin and Peakman Krienke, Manhattan Ballroom
148. Tom Martins, Bingo Royale
149. Mrs. Lupke
150. Marcella Murin
151. Eve McGoo
152. Sturat Ringwell

7pm

153. Larry Besse and Jack Chynowyth, Rempel Brothers Baseball Club
154. Ken Rauch, Saskatoon Dodgers Baseball Association Inc.
155. E. Skelton, Navy Leaque of Canada
156. Bruce Holiday, Saskatoon Rowing Club
157. Doug Fernets
158. Mr. Gardippi and Mr. Pettie, Saskatoon Indian and Metis Friendship Centre
159. J. Bechthold

Regina: Tuesday, November 5, 1985

2pm

160. Les Shaw and Peter Davies, City of Regina
161. Don Holzer and Alec MacDougall, Queen City Bingo and Centennial Bingo
162. Dale Bailey, Regina Community Bingo

7pm

163. Neil Reamsbottom, Disabled Veterans Association
164. Ron Schumacher, Regina Lions Junior Band
165. Lionel Ruhr, R + W Youth Club
166. Bill Spence, Regina Community Bingo
167. Ray Gerry, Eureka Fellowship Society

168. Jack Carmicheal, Regina Veterans Council
169. H.L. Aitken, Helen Karasin and M. Sawchuk, Army, Navy and Airforce Unit #18 and the Ladies Auxiliary
170. Alfred Hill, St. Mary's Roman Catholic Church Bingo Committee
171. Shug Kubota, Centennial Mall--a Merchant
172. Archie Mack, Holy Rosary Church Bingo

Wednesday: November 6, 1985

2pm

173. Fred Hannah, Turrey Centre
174. Sgt. Gale Lindskog, Regina City Police
175. Sgt. Ron Robinson, R.C.M.P.
176. O.A. MacGillivray, Department of Consumer and Commercial Affairs

7pm

177. Elaine and Jim Hughston, Regina Bingo Palace
178. Ron Merciew and Ben Huymink, Centennial Mall Merchants
179. John Worthington and Marion Kasha, Regina Lions Junior Band
180. R.A. Wankling and Herbert E. Taylor, Saskatchewan Urban Municipalities Association
181. W. Stechyshyn and Ruth Detz, Tavria Ukrainian Folk Dance Ensemble
182. Gil McDonald and Bob Herauf, Christopher Columbus Club
183. Ms. Svetkov and Ms. L Petvisov, Regina-South Saskatchewan Humane Society Inc.
184. John Leboldus and Mr. Houseman, Wheatland Chorus
185. Ms. Euku and Ms. Thunstrom, Queen City Kinsmen Gymnastics and Dance Group
186. Mr. Quesnel and Mr. Schierle, Canadian Hosteling Association
187. Hugh Rose, Knox Metropolitan Congregation
188. Mr. Patryluk and Mr. Murusiak, Ukrainian Society of Prosvita and the Ukrainian Greek Orthodox Auditorium
189. Murray Magee

Thursday, November 7, 1985

2pm

190. Bob Ober, William Rickard and Donna Harding, Challenger Bingo Ltd.
191. Marion and Julian Wira, Dreamland Bingo Palace
192. Pat Bidochka and Ron Kasha, Regina Lions Bingo Centre
193. Wayne Beamish, Optimist Club of Regina
194. Janice Campbell and Ms. Glasser, Prairie Gold Sweet Adelines
195. Unidentified Bingo Player

7pm

196. Mae Smith, Regina Riding and Driving Club
197. Neil Halford
198. William Rickard, Molsons Fastball Club
199. Bob Ober, Challenger Bingo Ltd.
200. Bob Willis and Ms. Thiel, Elks No. 9
201. Wayne McIntyre and Ron Kasha, Regina Lions Bingo Centre
202. Don Holzer, Queen City Bingo and Centennial Bingo
203. Pat Bidochka, Lakeside Lions Club
204. John Neale, Maple Leaf Lions Club
205. Ruth Raymer and Francis McIntosh, Empire Rebekah Lodge No. 43
206. J.L.Nimmons, Discovery Baptist Church
207. Ms. Grubb and Ms. Folbar, Ladies' Auxillary Disabled Veteran's Association
208. Jim Roberts and Wilbert McIvor, Saskatchewan Horseracing Association
209. William Lipinski, St. Peter's Mens Club
210. Dale Baldwin, Central Regina Early Learning Centre
211. Kim Wallace, Bob Buzush and Linda Maki, Regina Lions Ringette Team
212. Robert Ruttenberg, John Howard Society
213. Steve Lesiuk and Mark Piniach
214. John Campbell